

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA RIBEIRO,)
as individuals and as next friends and)
biological parents of LUCAS RIBEIRO, an)
infant,)
))
Plaintiffs,)
))
vs.)
))
BABY TREND, INC., et al.)
))
Defendants.)

Case No. 8:12-cv-00204

AMENDED ORDER
ON PRETRIAL CONFERENCE

A final amended pretrial conference was held on the 17th of April, 2017.
Appearing for the parties as counsel were:

For Plaintiffs: Michael Coyle, Jordan Adam, and Emily Wischnowski, Fraser
Stryker PC LLO.

For Defendants Indiana Mills & Manufacturing, Inc. ("IMMI"): Randall R. Riggs
and Matthew R. King, Frost Brown Todd, LLC; Ronald F. Krause, Cassem Tierney
Adams Gotch & Douglas.

For Defendants Lerado Group Co., Ltd., Lerado Group (Holding) Co., Ltd.,
Lerado (Zhong Shan) Industrial Co., Ltd., Lerado China Ltd., Lerado HK Ltd.
(collectively, "Lerado Defendants"); Dorel Industries, Inc.; and Maxi Miliaan B.V.: Jeff
Wright and Jessica Uhlenkamp, Heidman Law Firm, LLP.

(A) Exhibits. Each of the parties' amended exhibit lists is attached and is
incorporated by reference herein. The exhibits are objected to as specified on each
Exhibit List, except for objections under Fed. R. Evid. 402 and 403, which are reserved
until trial, per NECivR 16.1(a)(1)(A). Any party may offer any exhibit listed on any exhibit
list, even if that exhibit is not included on that party's exhibit list. The mere listing of an
exhibit on a party's exhibit list does not mean it can be offered into evidence by the
adverse party without all necessary evidentiary prerequisites being met first.

The parties have agreed they will exchange with each other their objections to
the exhibits on any other party's exhibit list by April 17, 2017, at 10:30 a.m. The parties
stipulate that the non-subpoenaed records that Defendants (as well as Baby Trend, Inc.,
Millenium Development Corp., and Mark Sedlack) have produced from their records in

this lawsuit are authentic and are business records within the meaning of FED. R. EVID. 803(6).

(B) Uncontroverted Facts. The parties have agreed that the following may be accepted as established facts for purposes of this case only:

1. Plaintiffs Franco Ribeiro and Deanna Ribeiro are husband and wife and the biological parents of Lucas Ribeiro, an infant born on October 1, 2010, (collectively "Ribeiro Family"), and are residents of the State of Nebraska. Franco and Deanna Ribeiro have brought this action on behalf of themselves and on behalf of Lucas Ribeiro as his next friends.

2. Defendant Indiana Mills & Manufacturing, Inc. ("IMMI") is an Indiana corporation that conducts business throughout the United States.

3. Defendants Lerado Group Co., Ltd., Lerado Group (Holding) Company, Ltd., Lerado (Zhong Shan) Industrial Co., Ltd., Lerado China Limited, and Lerado H.K. Limited (collectively, "Lerado"), are Chinese corporations.

4. Baby Trend, Inc. ("Baby Trend") is a California corporation who conducts business throughout the United States. Baby Trend marketed, sold and distributed its Baby Trend FLEX-LOC Infant Car Seat Model No. 6325 ("Car Seat") through retail stores in the State of Nebraska.

5. Mark Sedlack is an individual residing in the State of Ohio, and Millenium Development Corp. is an Ohio corporation.

6. The Car Seat at issue in this lawsuit was manufactured on February 28, 2006, at a Lerado facility in China.

7. Lucas Ribeiro was born a healthy male twin on October 1, 2010. He and his twin brother, Alex, lived in Kearney, Nebraska with their parents, Franco and Deanna Ribeiro.

8. Lucas Ribeiro was injured in the Car Seat on May 27, 2011, in Kearney, Nebraska.

(C) Controverted and Unresolved Issues. The issues remaining to be determined and unresolved matters for the court's attention are:

PLAINTIFFS' STATEMENT OF ISSUES

The following are the issues that Plaintiffs contend are remaining to be determined and/or are unresolved (Defendants object to Plaintiffs' characterization of these alleged issues, the claims that Plaintiff's make in the alleged issues, and contest

the accuracy of the elements of the causes of action set forth in Plaintiffs' statement of issues):

1. Plaintiffs' First Cause of Action: Negligence - Failure to Use Reasonable Care

- a. Whether Defendants designed, manufactured, supplied, sold, and/or distributed the Car Seat and/or components parts for the Car Seat.
- b. Whether Plaintiffs were those who used the Car Seat for a purpose for which the designer, manufacturer, and/or supplier should expect it to be used or those whom the designer, manufacturer, and/or supplier should expect to be endangered by its intended use.
- c. Whether Defendants failed to use reasonable care:
 - i. To see that the Car Seat was safe for the use for which it was made; or
 - ii. By knowing or having reason to know that the Car Seat was dangerous when put to the use for which it was made and that those for whose use the Car Seat was made would not realize the danger, and failing to provide an adequate warning of that danger;
- d. Whether Defendants' failure to use reasonable care was a proximate cause of some damage to Plaintiffs; and
- e. The nature and extent of Plaintiffs' damages.

2. Plaintiffs' First Cause of Action: Negligence - Failure to Warn

- a. Whether Defendants designed, manufactured, supplied, sold, and/or distributed the Car Seat and/or components parts for the Car Seat;
- b. Whether Plaintiffs were those who used the Car Seat for a purpose for which the designer, manufacturer, and/or supplier should expect it to be used or those whom the designer, manufacturer, and/or supplier should expect to be endangered by its intended use;
- c. Whether Defendants knew or had reason to know that the Car Seat was likely to be dangerous when put to the use for which it was designed, manufactured, supplied, sold, and/or distributed;
- d. Whether Defendants knew or had reason to know that those for whose use the Car Seat was designed, manufactured, supplied, sold, and/or distributed would not realize the danger;

- e. Whether Defendants failed to provide reasonably foreseeable users of the Car Seat with adequate warning of that danger;
 - f. Whether this failure to warn reasonably foreseeable users of the Car Seat of the danger was a proximate cause of some damage to Plaintiffs; and
 - g. The nature and extent of that damage.
- 3. Plaintiffs' Second Cause of Action: Strict Liability – Design and/or Manufacturing Defect
 - a. Whether Defendants placed the Car Seat on the market;
 - b. Whether, at the time the Car Seat left Defendants' possession, it was defective in one or more of the ways claimed by Plaintiffs;
 - c. Whether the Car Seat's defects made it unreasonably dangerous for its intended use, or for any use the defendants could have reasonably foreseen;
 - d. Whether the Car Seats defects were a proximate cause of some damages to Plaintiffs; and
 - e. The nature and extent of Plaintiffs' damages.
- 4. Plaintiffs' Third Cause of Action: Strict Liability – Failure to Warn
 - a. Whether Defendants placed the Car Seat on the market;
 - b. Whether, at the time the Car Seat left Defendants' possession, it failed to warn or protect against a danger or hazard in the use, misuse, or intended use of it, or the failure to provide proper instructions for the use of it;
 - c. Whether the Car Seat's inadequate warnings made it unreasonably dangerous for its intended use, or for any use the defendants could have reasonably foreseen;
 - d. Whether the Car Seats inadequate warnings were a proximate cause of some damages to Plaintiffs; and
 - e. The nature and extent of Plaintiffs' damages.
- 5. Plaintiffs' Fourth Cause of Action: Breach of Express Warranty
 - a. Whether Defendants sold the Car Seat;

- b. Whether Defendants expressly warranted that the Car Seat was safe and reasonably fit for its intended purpose to hold and carry infants;
 - c. Whether Plaintiffs are persons who could have been expected to use, consume, or be affected by the Car Seat;
 - d. Whether the Car Seat did not conform to the warranty, the Car Seat was not in compliance with the warranty, the Car Seat was not as it was warranted to be, or the Car Seat failed to perform as warranted;
 - e. Whether, within a reasonable time after Plaintiffs discovered Defendants' breach, they gave Defendants notice of the breach;
 - f. Whether Defendants' breach was a proximate cause of some damage to the Plaintiffs; and
 - g. The nature and extent of Plaintiffs' damages.
6. Plaintiffs' Fifth Cause of Action: Breach of Implied Warranty of Merchantability
- a. Whether Defendants sold the Car Seat;
 - b. Whether, at the time of the sale of the Car Seat, Defendants were merchants with respect to goods of that kind;
 - c. Whether, at the time the Defendants sold the Car Seat, it was not merchantable;
 - d. Whether, within a reasonable time after Plaintiffs discovered Defendants' breach, they gave Defendants notice of the breach;
 - e. Whether Defendants' breach was a proximate cause of some damage to the Plaintiffs; and
 - f. The nature and extent of Plaintiffs' damages.
7. Plaintiffs' Sixth Cause of Action: Breach of Implied Warranty for Particular Purpose
- a. Whether Defendants sold the Car Seat;
 - b. Whether, when the sale was made, Plaintiffs purchased the Car Seat for the purpose of safely holding and carrying an infant;
 - c. Whether, when the Car Seat was sold, Plaintiffs were relying on Defendants' skill or judgment to furnish a car seat suitable for that purpose and Defendants had reason to know of this reliance;

- d. Whether, at the time the Car Seat was delivered by Defendants, it was not fit for the particular purpose in question;
 - e. Whether, within a reasonable time after Plaintiffs discovered the Car Seat was not fit for the particular purpose, Plaintiffs gave Defendants notice of the breach;
 - f. Whether the breach of this warranty was a proximate cause of some damages to Plaintiffs; and
 - g. The nature and extent of Plaintiffs' damages.
8. Plaintiffs' Seventh Cause of Action: Magnuson Moss Act
- a. Whether Defendants breach of expressed warranties and implied warranties is a violation of the Magnuson Moss Act, 15 U.S.C. § 2301 et seq.
 - b. Whether Defendants failed to comply with their obligations under their implied warranties;
 - c. Whether within a reasonable time after Plaintiffs discovered Defendants' breach, they gave notice to Defendants of their breach of express and implied warranties;
 - d. Whether the breach of this warranty was a proximate cause of some damages to Plaintiffs; and
 - e. The nature and extent of Plaintiffs' damages.
9. Whether Defendants were negligent in failing to use reasonable care in designing, manufacturing, marketing, labeling, packaging, testing, and selling the Car Seat.
10. Whether Defendants were negligent in failing to use reasonable care to see that the Car Seat was safe for its intended use.
11. Whether Defendants failed to warn reasonably foreseeable users that the Car Seat was dangerous when put to the use for which it was made.
12. Whether Defendants are designers and/or manufacturers.
13. Whether Defendants are apparent designers and/or manufacturers.
14. Whether Plaintiffs are entitled to recover attorneys' fees and costs for prevailing on their Magnusson-Moss Claim, under 15 U.S.C. § 2310(d)(2). (**For the Court**).

15. Whether Defendants Maxi Miliaan B.V. and Dorel Industries, Inc., are liable as successors in interest to Defendants Lerado Group Co., Ltd., Lerado Group (Holding) Co., Ltd., Lerado (Zhong Shan) Industrial Co., Ltd., Lerado China Ltd., Lerado HK Ltd. ("Lerado Defendants") for each and every action or inaction applicable to the Lerado Defendants.
 - a. The Lerado Defendants object to inclusion or any reference to successor liability in this matter pursuant to the Court's bifurcation order entered December 29, 2015. (Docket Entry 324).
16. Whether and to what extent the Defendants are jointly and severally liable for Plaintiffs' injuries and damages.
17. Whether Defendants acted in concert as part of a common enterprise or plan that caused harm to Plaintiffs.
18. Whether Deanna Ribeiro's and/or Franco Ribeiro's alleged negligence or alleged misuse of the Car Seat may be imputed to their infant son, Lucas Ribeiro.
19. Whether Defendants' alleged defenses are applicable to the facts in this lawsuit and whether any of the Defendants have waived any of their alleged defenses by, among other things, failing to plead them.
20. Whether any of the Defendants or their agents, employees, or representatives spoliated any evidence with regard to any of the matters alleged in the above-captioned lawsuit, including whether Plaintiffs are entitled to relief, in the form of an instruction to the jury or otherwise, due to spoliation of evidence.

LERADO DEFENDANTS' STATEMENT OF ISSUES

The following are the issues that the Lerado Defendants contend are remaining to be determined and/or are unresolved (Plaintiffs object to the Lerado Defendants' characterization of these alleged issues and the claims that the Lerado Defendants make in the alleged issues):

1. Misuse of the Product
 - a. That Plaintiff Deanna Ribeiro used the product in one or more ways claimed by Defendants;
 - b. That Defendants could not have reasonably foreseen such a use of the product;
 - c. That this misuse was a proximate cause of Lucas Ribeiro's injuries.
2. Misuse

- a. Failure to follow plain and unambiguous instructions is a misuse of the product. Misuse is a failure to exercise due care, from which the Defendant may raise the issue of contributory negligence.
3. State of the Art¹
 - a. The design, testing, and labeling of the Car Seat conformed with the generally recognized and prevailing state of the art in the industry.
4. Contract Specification Defense²
 - a. Lerado contends it manufactured the subject Car Seat in accordance with the plans and specifications of Mark Sedlack, Millenium Development Corp., and Baby Trend.
 - b. Lerado contends Nebraska has adopted the following rule: a manufacturer is not liable for injuries to a user of a product which it has manufactured in accordance with plans and specifications of one other than the manufacturer, except where the plans are so obviously, patently, or glaringly dangerous that a manufacturer exercising ordinary care under the circumstances then existing would not follow them. *Moon v. Winger Boss Co.*, 205 Neb. 292, 300; 287 N.W.2d 430, 434 (1980).
 - i. Plaintiffs object to the inclusion or any reference to any alleged contractor specification defense in this lawsuit. Plaintiffs dispute that Nebraska has adopted any such alleged contractor specification defense. Plaintiffs also state that the Lerado Defendants did not plead that alleged defense in their Answer to Plaintiffs' Seventh Amended Complaint. (See Filing No. 438.) Plaintiffs object to any attempt by Defendants to litigate this issue at trial. Further, Plaintiffs state that any such alleged defense is not applicable to, or meritorious on, the facts of this case, as Plaintiffs have shown in their Brief in Opposition to the Lerado Defendants' Motion for Summary Judgment. (See Filing No. 605, pp. 71-87.)
5. Lerado Defendants assert that Plaintiffs were at fault and that their fault was a cause of injuries to Lucas Ribeiro. As such, Neb. Rev. Stat. § 25-21, 185.07-.12 applies to Plaintiffs' claims.
6. Assumption of the Risk
 - a. Plaintiffs knew of or understand the specific danger;

¹ Lerado contends it was not the designer of the subject Car Seat, but submits this issue to the extent the Court finds otherwise.

² The Lerado Defendants have moved for summary judgment on this issue. See Doc. 568.

- b. Plaintiffs voluntarily exposed Lucas Ribeiro to the danger; and
- c. Lucas Ribeiro's injuries occurred as a result of his exposure to the danger.

IMMI'S STATEMENT OF ISSUES

The following are the issues that IMMI contends are remaining to be determined and/or are unresolved (Plaintiffs object to IMMI's characterization of these alleged issues and the claims that IMMI makes in the alleged issues):

1. Whether IMMI had a duty to Plaintiffs as a nondefective component part supplier.
 - a. Whether IMMI had a duty to test the manufacturer's final product;
 - b. Whether component part suppliers can be responsible for accidents that result when its parts are integrated into a larger system the component part supplier did not design or build; and
 - c. Whether the sale of a single component of a system can make IMMI responsible for the overall design of the harness system and/or Car Seat.
2. Whether and to what extent the respective Defendants participated and/or had a duty to participate in the design of the Car Seat, including but not limited to the design of the instructions and warnings for or on the Car Seat.
 - a. Whether IMMI designed the Car Seat.
 - b. Whether IMMI had a duty to design the Car Seat.
 - c. Whether IMMI designed the instructions and/or warnings for or on the Car Seat.
 - d. Whether IMMI had a duty to design the instructions and/or warnings for or on the Car Seat.
3. Whether IMMI's component part proximately caused Plaintiffs' alleged damages.
4. Whether IMMI is not liable because it manufactured its component part in accordance with the specifications of Mark Sedlack.
 - a. Whether IMMI manufactured its component part in accordance with the specifications of Mark Sedlack.
 - b. Whether the specifications of Mark Sedlack for IMMI's component part were so obviously, patently, or glaringly dangerous that IMMI should not follow them.

- i. Plaintiffs object to the inclusion or any reference to any alleged contractor specification defense in this lawsuit. Plaintiffs dispute that Nebraska has adopted any such alleged contractor specification defense. Plaintiffs also state that IMMI did not plead that alleged defense in their Answer to Plaintiffs' Seventh Amended Complaint. (See Filing No. 329.) Plaintiffs object to any attempt by Defendants to litigate this issue at trial. Further, Plaintiffs state that any such alleged defense is not applicable to, or meritorious on, the facts of this case, as Plaintiffs have shown in their Brief in Opposition to the Lerado Defendants' Motion for Summary Judgment. (See Filing No. 605, pp. 71-87.)
5. Whether any affirmation of fact or promise made by Defendant became part of the basis of the bargain.
6. Whether Plaintiffs' implied warranty claims are merged with their strict product liability claims and therefore should not be submitted to the jury.
7. Whether Plaintiffs' Magnuson Moss Act claims fail by virtue of their failure to prove their breach of warranty claims under applicable state law.
8. Whether Plaintiffs' claims were proximately caused by the negligence of Deanna Ribeiro and/or Franco Ribeiro.
9. Whether Plaintiffs' damages, if any, were caused by intervening and/or superseding acts and/or omissions of persons and/or entities for whose conduct IMMI cannot be held liable.
10. Whether Plaintiffs' claims are barred by virtue of their assumption of the risk.
11. Whether Plaintiffs' claims are barred by virtue of their misuse of the product.
12. Whether IMMI's product was in conformity with the generally recognized state-of-the-art in the industry at the time it was first sold.
13. Whether IMMI's product was fit for its intended purposes when it was first sold.
14. Whether IMMI's product did not contain any non-conformities or defects when it was first sold.
15. Whether IMMI's product complied with any limited written express warranties when it was first sold.
16. Whether IMMI's product was defective or unreasonably dangerous when it was first sold.

17. Whether Plaintiffs failed to properly and timely notify IMMI of any alleged defect, condition, non-conformity, or breach of warranty as required by law.
18. Whether Plaintiffs' claims are barred and/or limited by applicable disclaimers of warranty and/or limitation of damages provisions.
19. Whether any act or conduct by IMMI caused any injury, damage, or loss to Plaintiffs.
20. Whether Plaintiffs failed to reasonably mitigate any damages or losses they allegedly sustained.
21. Whether Plaintiffs as parents are permitted under Nebraska law to present claims for loss of parental consortium for the alleged nonfatal injury to a child.
22. Whether, in the event IMMI is found jointly and severally liable with any other defendant, IMMI has a right to contribution and its liability should be reduced by the amount of other parties' percentages of fault as determined by the finder of fact pursuant to Neb. Rev. Stat. Sec. 25-21,185.10.
23. Whether evidence was spoliated by parties or non-parties, and whether Defendants are entitled to relief, in the form of an instruction to the jury or otherwise, due to spoliation of evidence.

LIST OF THE PARTIES' PENDING MOTIONS

1. The parties' respective motions *in limine*, which were filed on March 24, 2017.
2. The parties' respective Daubert motions and associated request(s) for oral argument, filed on March 24, 2017.
3. IMMI's Motion to Strike and associated request for oral argument, filed on March 24, 2017.
4. IMMI's Motion to Strike Opinions of Ted Sokol (filing no. 770)
5. Other motions and associated request(s) for oral argument to be filed on or after April 17, 2017.

(D) Witnesses. Each of the parties' amended witness lists are attached and are incorporated by reference herein. It is understood that, except upon a showing of good cause, no witness whose name does not appear on a parties' witness list shall be permitted to testify over objection for any purpose except impeachment. A witness whose only testimony is intended to establish foundation for an exhibit for which foundation has not been waived shall not be permitted to testify for any other purpose,

over objection, unless such witness has been disclosed pursuant to Federal Rule of Civil Procedure 26(a)(3). A witness appearing on any party's witness list may be called by any other party.

Defendants state that all witnesses expected to be called to testify, except those who may be called for impeachment purposes as defined in NECivR 16.2(c) only, are listed. Defendants object to Plaintiffs calling witnesses listed on Plaintiffs' Witness List by deposition without first satisfying the conditions of Fed. R. Civ. P. 32(a); however, the parties have stipulated that at least these three witnesses are unavailable for trial and may testify by deposition: Suzanne Haney, M.D., Omaha, NE; Chandrika Rizal, M.D., Omaha, NE; and Fernando Zapata, M.D., Omaha, NE. Plaintiffs also reserve their right to object to the calling of any witnesses identified on Defendants' witness lists.

(E) Expert Witnesses' Qualifications. Experts who may be called by Plaintiffs and their qualifications are:

Rule 26(a)(2)(B) witnesses:

Kathie Allison, PT, MS, CLCP (see attached qualifications);
Terry L. Stentz, Ph.D., MPH, CPE (see attached qualifications);
Kelli R. Herstein, Ph.D. (see attached qualifications);
Arthur W. Hoffman, Ed.D., P.E. (see attached qualifications);
Prashant Joshi, M.D. (see attached qualifications);
John O. Ward, Ph.D. (see attached qualifications);
Kurt V. Krueger, Ph.D. (see attached qualifications); and
Ted Sokol, Ph.D. (see attached qualifications).

Rule 26(a)(2)(C) witnesses:

Jill Bell, APRN-NP (treating medical provider);
Heidi Blum (Hillrise Elementary - Lucas Ribeiro's teacher);
Jamie Cummings (Safe Kids Platte Valley);
Debora Goebel, M.D. (treating medical provider);
Joe Graf (treating medical provider);
Suzanne Haney, M.D. (treating medical provider);
Susan L. Hansen, R.N. (treating medical provider);
Adam T. Kafka, M.D. (treating medical provider);
Katherine A. Keifer, M.D. (treating medical provider);
Angela Kratochvil-Stava, M.D. (treating medical provider);
Gary S. Lerner, M.D. (treating medical provider);
Jacqueline Liess (Safe Kids Platte Valley);
Bill Maendela, EMT (treating medical provider);
Dawn M. Murray, M.D. (treating medical provider);
Young Oliver, M.D. (treating medical provider);

Ivan Pakvovic, M.D. (treating medical provider);
Chandrika Rizal, M.D. (treating medical provider);
Kimberly Roberts (Hillrise Elementary – Lucas Ribeiro’s teacher);
Mark C. Wilson, M.D. (treating medical provider); and
Fernando Zapata, M.D. (treating medical provider);

Experts who may be called by Defendants Lerado Group Co., Ltd, Lerado Group (Holding) Company Ltd., Lerado (Zhong Shan) Industrial Co., Ltd., Lerado China Limited, Lerado H.K. Limited, Dorel Industries, Inc., and Maxi Miliaan B.V., and their qualifications are:

Rule 26(a)(2)(B) witnesses:

William W. Van Arsdell, Ph.D., P.E. (see attached qualifications);
Christine T. Wood, Ph.D. (see attached qualifications); and
Michael T. Prange, Ph.D., P.E. (see attached qualifications);

Experts who may be called by Defendant Indiana Mills & Manufacturing, Inc., and their qualifications are:

Rule 26(a)(2)(B) witnesses:

James R. Chinni, P.E. (see attached qualifications); and
William W. Van Arsdell, Ph.D., P.E. (see attached qualifications).

(F) Voir Dire. Counsel have reviewed Federal Rule of Civil Procedure 47(a) and NECivR 47.2(a) and suggest the following with regard to the conduct of juror examination:

The parties request that the Court allow the submission of voir dire questions no later than three (3) days prior to the first day of trial (i.e. April 21, 2017) and that the Court conduct a preliminary examination of prospective jurors, with counsel for both parties asking follow-up questions. Any party requesting the use of a juror questionnaire shall prove a copy of the proposed questionnaire to all other parties at least three (3) days prior to the first day of trial.

(G) Number of Jurors. Counsel have reviewed Federal Rule of Civil Procedure 48 and NECivR 48.1. Plaintiffs and the Lerado Defendants suggest that this matter be tried to a jury composed of six (6) members with one (1) alternate. IMMI suggests that this matter be tried to a jury composed of twelve (12) members with two (2) alternates.

(H) Verdict. The parties will not stipulate to a less-than-unanimous verdict at this time.

(I) Briefs, Instructions, and Proposed Findings. Counsel have reviewed NECivR 39.2(a), 51.1(a), and 52.1, and suggest the following schedule for filing trial briefs, proposed jury instructions, and proposed findings of fact, as applicable:

Unless otherwise ordered, trial briefs, proposed jury instructions, and proposed findings of fact and conclusions of law, shall be filed seven (7) days before the first day of trial (i.e. April 17, 2017). Objections to proposed jury instructions shall be filed three (3) days before the first day of trial (i.e. April 21, 2017).

(J) Length of Trial. Plaintiffs and the Lerado Defendants estimate that the length of trial will take no more than ten (10) days. IMMI estimates the length of trial will take ten (10) days.

(K) Trial Date. Trial is set to begin on Monday, April 24, 2017, at 8:30 A.M., in the Roman L. Hruska Federal Courthouse, Courtroom No. 3, Omaha, Douglas County, Nebraska.

(L) Deposition and Written Discovery Designations. The parties have agreed they will exchange their written discovery and deposition designations with each other by April 17, 2017. Plaintiffs propose that they will exchange any written discovery and deposition counter-designations by April 19, 2017. IMMI and the Lerado Defendants propose that the parties exchange counter-designations on April 21, 2017. The parties, however, have agreed to revisit this issue once they exchange their counter-designations on April 17, 2017.

(M) Demonstratives. The parties will make any demonstrative exhibit available by 10:00 a.m. the day before the witness with which it will be used is identified to testify [see (N) below]. For example, if a party plans to use a demonstrative exhibit with a witness planned to be called on Wednesday, then that party will make that demonstrative exhibit available by Tuesday at 10:00 a.m.

(N) Witnesses. The parties propose that they will attempt to identify witnesses to be called to testify by 5 p.m. two business days before they will testify. For

example, if a party plans to call a witness on Wednesday, then that party will inform counsel of that by Monday at 5 p.m.

SO ORDERED this 17th day of APRIL, 2017.

BY THE COURT:



THE HONORABLE F.A. GOSSETT
U.S. MAGISTRATE JUDGE

Agreed to by the parties as indicated by the signatures of counsel below.

By: 

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INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA RIBEIRO,)
as individuals and as next friends and)
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infant,)

Plaintiffs,)

vs.)

BABY TREND, INC., et al.)

Defendants.)

Case No. 8:12-cv-00204

PLAINTIFFS' AMENDED
EXHIBIT LIST WITH
IMMI'S OBJECTIONS

COME NOW Plaintiffs, Franco Ribeiro and Deanna Ribeiro, by and through their
counsel, and hereby submit the following amended exhibit list, subject to offer:

Trial Date: April 24, 2017

EXHIBIT NUMBERS										
PLF	BT/ MDC	IMMI	LER	DEP	DESCRIPTION	OFF	OBJ	RCVD	NOT RCVD	DATE
1				1	Notice to Take Depo. (Millennium Develop.)		H, R			
2				2	Resume (Mark Sedlack)		H			
3				3	MDC's Answers to Interrogatories					
4				4	Patent for Car Seat (Sedlack) (05-09-06)					
5				5	Patent for Car Seat (Sedlack) (02-28-06)					
6				6	Patent for Car Seat (Sedlack) (12-27-05)					
7				7	Patent for Car Seat (Sedlack) (07-12-05)					
8				8	Patent for Car Seat (Sedlack) (07-05-05)					
9				9	Patent for Car Seat (Sedlack) (12-28-04)					
10				10	Patent for Car Seat (Sedlack) (11-02-04)					
11				11	Photos (Baby Trend car seat)					
12				12	Owner's Manual for Flex-Loc Car Seat (01.04)		R			
13				13	Owner's Manual for Flex-Loc Car Seat (01.05)		R			

14				14	Owner's Manual for Flex-Loc Car Seat (01.06)					
15				15	Consultant Agreement (05-13-03)					
16				16	Consultant Agreement (03-03-00)					
17				17	Car Seat Project Schedule					
18				18	Car Seat Documents from Mark Sedlack [MDC00741-780]					
19				19	Photos (alternative harness for car seat)		R			
20				20	Patent Information (chest clip) [MDC00016-24]					
21				21	11-11-05 Email between Defendants		H			
22				22	09-14-05 Email between Defendants		H, O (no characterizing foreign language without translation)			
23				23	10-27-05 Email between Defendants		H			
24				24	10-11-05 Email between Defendants		H, O (for. lang.)			
25				25	Photo (MGA post-test crash)					
26				26	ASTM F2050-13a					
27				27	Lerado Car Seat Production Details					
28				28	Patent Drawings (Latch-Loc car seat)					
29				29	Photos (crotch buckle)					
30				30	Baby Trend Product Catalog (2006-07)		R (other products)			
31				31	Instruction Manual (Trendsport Trav.) (06-06)					
32				32	Patent Overview (Latch-Loc car seat - travel)					
33				33	Product Description (Latch-Loc car seat)					
34				34	Revisions to FMVSS 213 (08-01-05)					
35				35	Crash-test Matrix Data (04-12-7)					
36				36	NHTSA Test Report (Flex-Loc 6325) (06-02-06)					
37				37	NHTSA Test Report (Flex-Loc 6325) (07-24-06)					

38			38	Photo (European car seat)	R (other products)			
39			39	Photo (European car seat)	R (other products)			
40			40	Notice to Take Depo (Baby Trend)	H, R			
41			41	Baby Trend Customer Support Log (12-20-11)				
42			42	News Report (Alpha Group acquisition)	H			
43			43	Lerado Car Seat Production Agreement				
44			44	Baby Trend's Answers to Rogs				
45			45	Baby Trend's Answers to Rogs (Supp. #1)				
46			46	Baby Trend's Answers to Rogs (Supp. #2)				
47			47	Lerado Organizational Charts	H, O (for lang.)			
48			48	05-09-12 Ltr. from Fraser Stryker	H, O (for lang.)			
49			49	Instruction Manual (Trendsport Trav.) (07-05)				
50			50	Baby Trend's Rule 26(a)(1) Initial Disclosures				
51			51	Indiana Mills Documents (IMMI.0001-0139) [Plaintiffs will not offer IMMI.0137-0139.]				
52			52	Gnotec Documents				
53			53	Notice to Take Depo (IMMI)	H, R			
54			54	Photos (A-Lok adjuster strap)				
55			55	Document Retention Policy (IMMI)	R			
56			56	Notice to Take Depo (Deanna Ribeiro)	H, R			
57			58	Photos (Baby Trend car seat) (04-06-16)				
58			59	Photos (taken from accident scene by KPD)				
59			61	Safe Kids Checklist (Baby Trend car seat)				
60			62	Google Map (Ribeiro home)				
61			64	Drawing (Ribeiro home)				
62			65	Google Map (Ribeiro home)				

63				66	Google Map (Ribeiro home)					
64				67	Records (Kearney Police Department)		H, O (arg.) (objs. to letters from counsel only)			
65				67C	Police Interview (Deanna Ribeiro)		H			
66				67D	Police Interview (Franco Ribeiro)		H			
67				68	Records (Good Samaritan Hospital)		H, O (spec., 702), FD (objs. to parts)			
68				69	Records (Kearney Clinic, P.C.)		H, O (spec., 702), FD (objs. to parts)			
69				70	Curriculum Vitae (Dawn Murray, M.D.)		H			
70				71	Curriculum Vitae (Angela Kratochvil, M.D.)		H			
71				72	Curriculum Vitae (Katherine Keifer, M.D.)		H			
72				73	Good Samaritan H & P		H, O (spec., 702), FD (objs. to parts)			
73				74	Good Samaritan ER record		H, O (spec., 702), FD (objs. to parts)			
74				75	Good Samaritan discharge page		H, O (spec., 702), FD (objs. to parts)			
75				76	Good Samaritan progress note		H, O (spec., 702), FD (objs. to parts)			
76				77, <small>p. 24-27 31-38</small>	Records (Safe Kids Platte Valley)		H, R, FD (pp. 31-38)			
77				78	Safe Kids Checklist Form					
78				79	Safe Kids Checklist (Baby Trend car seat)					
79				80	Notes (Officer Dowling)					

80				81	Photo (accident scene)					
81				82	Curriculum Vitae (Chandrika Rizal, M.D.)		H			
82				83	Medical Records (Chandrika Rizal, M.D.)		H, O (spec., 702), FD (objs. to parts)			
83				84	Office Visit (Chandrika Rizal, M.D.) (06-21-16)		H, O (spec., 702), FD (objs. to parts)			
84				85	Office Visit (Chandrika Rizal, M.D.) (04-18-16)		H, O (spec., 702), FD (objs. to parts)			
85				86	Medical Bills (Lucas Ribeiro)		U			
86				87	Curriculum Vitae (Suzanne Haney, M.D.)		H			
87				88	Medical Records (Children's Hospital / Phys.)		H, O (spec., 702), FD (objs. to parts)			
88				89	Consult Note (Suzanne Haney) (05-28-11)		H, O (spec., 702), FD (objs. to parts)			
89				90	Baby Trend Call Logs (Model #6325)		H, R, FD (other incidents)			
90				91	Child Restraint Registration Card (redacted)					
91				92	Notice to Take Depo (Lerado)		H, R			
92				93	Plaintiffs' Complaint (7th Amended)		H, O (arg.)			
93				94	Lerado's Answer to Complaint (7th Amended)		H, O (arg.)			
94				95	Lerado Company Profile (05-14-06)		H			
95				96	Baby Trend Documents					
96				97	LinkedIn Profile (Roger Hsu)		H, R			
97				98	Lerado Specification Manual					
98				99	Lerado Invoice (06-05-07)					
99				100	Lerado Car Seat Issues Spreadsheet		O (for. lang.)			
100				102	Lerado Test Reports (Lerado.0218-0243)		O (for. lang.)			

101			103	Photos (car seats)	R (other products)			
102			104	Lerado Parts Agreements (March 22, 2007)	O (for. lang.)			
103			105	Lerado documents (Lerado.0273-0278)	O (for. lang.)			
104			106	Lerado documents (Lerado.0279-0290)	O (for. lang.)			
105			107	Lerado Patent List	O (for. lang.)			
106			108	MDC documents	O (for. lang.)			
107			109	Baby Trend Purchase Orders				
108			110	Notice to Take Depo (Denny Tsai)	H, R			
109			111	Baby Trend Website (02-23-06)	H, FD			
110			112	Baby Trend Website (02-05-06)	H, FD			
111			113	Baby Trend Website (03-13-06)	H, FD			
112			114	Owner's Manual for Flex-Loc Car Seat (01.04)				
113			115	Baby Trend Website (10-15-07)	H, FD			
114			116	Baby Trend Call Logs	H, R, FD (other incidents)			
115			117	Emails between Defendants				
116			119	Expert Report (Arthur Hoffmann, P.E.)	H, O (702)			
117			121	Curriculum Vitae (Arthur Hoffmann, P.E.)	H			
118			124	Expert Report (Kathie Allison)	H			
119			125	Curriculum Vitae (Kathie Allison)	H			
120			126	Expert Report (Prashant Joshi, M.D.)	H			
121			130	Curriculum Vitae (Kathie Allison)	H			
122			131	Expert Report (revised) (Kathie Allison)	H, O (late)			
123			135	Expert Report (John Ward, Ph.D.)	H			
124			137	Summary of Economic Loss (Lucas Ribeiro)	H			
125			138	Educational Attainment (females)	H, O (late)			
126			138A	Educational Attainment (males)	H, O (late)			
127			140	Expert Report (Kathie Allison)	H			
128			143	Curriculum Vitae (Fernando Zapata, M.D.)	H			

129			144	Medical Records	H, O (spec., 702), FD (objs. to parts)			
130			145	Medical Records (CDC Clinic) [CDC.CLINIC.0244-0249]	H, O (spec., 702), FD (objs. to parts)			
131			146	Progress Note (08-11-2012)	H, O (spec., 702), FD (objs. to parts)			
132			148	Expert Report (Terry Stentz / Kelli Herstein)	H			
133			150	Curriculum Vitae (Terry Stentz, Ph.D.)	H			
134			151	Expert File (Terry Stentz, Ph.D.)				
135			151A	Registration Card (Kassidy Hurlbutt)				
136			151B	Photos (Baby Trend car seat)				
137			151D	Additional Info. (Kelli Herstein, Ph.D.)				
138			154	Expert Rebuttal Report (Kelli Herstein, Ph.D.)	H, O (late)			
139			175	Notice to Take Depo (William Van Arsdell)	H, R			
140			176	Response to Depo. Notice (Van Arsdell)	H			
141			178, p 2849- 2857	Invoices (Van Arsdell)	R			
142			185	Notice to Take Depo (James Chinni)	H, R			
143			187	Invoices (James Chinni)	R			
144			188	Photos (Baby Trend Car Seat)				
145			189	Inspection Report (Julia King)				
146			190	Product Description Sheet (A38042A)				
147			191	Product Description Sheet (F14193)				
148			192	Invoices (Michael Prange)	R			
149			193	Photos (Baby Trend car seat)				
150			194	Photos (two babies)				
151			196	CAMI 6-Month Old Dummy Information				
152			197	Photos (CAMI Dummy)				
153			200	Expert Report (Ted Sokol, P.E.)	H, O (late)			
154			201	Expert File (Ted Sokol, P.E.)				

155				1	Lerado Car Seat Production Agreement (Depo of Baby Trend, 06-23-2015)					
156				2	Baby Trend's Answers to Interrogatories (Depo of Baby Trend, 06-23-2015)					
157				5	Communications on OPP Car Seat (Depo of Baby Trend, 06-23-2015)					
158				6	Communications with Lerado (Depo of Baby Trend, 06-23-2015)					
159				7	Communications with Lerado (Depo of Baby Trend, 06-23-2015)					
160				8	Communications with Lerado (Depo of Baby Trend, 06-23-2015)					
161				1	Corporate Structure (Kendrion) (Depo of Gnotec, 06-24-2015)		R			
162				2	Invoices (Kendrion) (Depo of Gnotec, 06-24-2015)					
163				3	Spreadsheet (buckle information) (Depo of Gnotec, 06-24-2015)					
164				4	Corporate Structure (Kendrion / Gnotec) (Depo of Gnotec, 06-24-2015)		R			
165				1	Notice to Take Depo (Lerado Zhong Shan) (Depo of Lerado Zhong Shan, 08-19-2015)		H, R			
166				2	Lerado Car Seat Production Agreement (Depo of Lerado Zhong Shan, 08-19-2015)					
167				4	Invoice (Kendrion) (Depo of Lerado Zhong Shan, 08-19-2015)					
168				1	Notice to Take Depo (Lerado Group Holding) (Depo of Lerado Group Holding, 11-11-2015)		H, R			
169				2	Notice to Take Depo (Lerado China Limited) (Depo of Lerado Group Holding, 11-11-2015)		H, R			
170				3	Notice to Take Depo (Lerado Group Co. Ltd.) (Depo of Lerado Group Holding, 11-11-2015)		H, R			
171				4	Notice to Take Depo (Lerado H.K. Limited) (Depo of Lerado Group Holding, 11-11-2015)		H, R			
172				5	Lerado Car Seat Production Agreement					

					(Depo of Lerado Group Holding, 11-11-2015)					
173				6	Lerado Organizational Chart (Depo of Lerado Group Holding, 11-11-2015)		R			
174				7	Meeting Minutes (Lerado China Limited) (Depo of Lerado Group Holding, 11-11-2015)		R			
175				8	Lerado Group Holding Annual Report (2006) (Depo of Lerado Group Holding, 11-11-2015)		R			
176				12	Stock Certificate (Lerado Group Limited) (Depo of Lerado Group Holding, 11-11-2015)		R			
177				13	Delaware SOS Listing (Lerado Success, Inc.) (Depo of Lerado Group Holding, 11-11-2015)		R			
178				14	Pennsylvania SOS Listing (Lerado Success) (Depo of Lerado Group Holding, 11-11-2015)		R			
179				15	Stock Certificate (Mia Moda Inc.) (Depo of Lerado Group Holding, 11-11-2015)		R, FD			
180				16	Pennsylvania SOS Listing (Mia Moda Inc.) (Depo of Lerado Group Holding, 11-11-2015)		R			
181				17	South Carolina SOS Listing (Mia Moda Inc.) (Depo of Lerado Group Holding, 11-11-2015)		R			
182				18	10-31-07 Ltr. from Mia Moda Inc. to NHTSA (Depo of Lerado Group Holding, 11-11-2015)		R, FD			
183				19	NHTSA Consumer Advisory (Lerado recall) (Depo of Lerado Group Holding, 11-11-2015)		R			
184				20	Lerado document (chest clip) (Depo of Lerado Group Holding, 11-11-2015)					
185				22	Lerado Group Holdings Customer List (Depo of Lerado Group Holding, 11-11-2015)		R			
186				23	Invoice (Kendrion) (Depo of Lerado Group Holding, 11-11-2015)					
187				26	NHTSA Recall Information (Lerado recall) (Depo of Lerado Group Holding, 11-11-2015)		R			
188				28	Invoices (Kendrion)					

					(Depo of Lerado Group Holding, 11-11-2015)					
189					Photos (KPD - accident scene) [KPD.0001-0263]					
190					Photos (KPD - at station) [PHOTOS.020-050]					
191					Police Interview (Deanna Ribeiro) - audio		H			
192					Police Interview (Deanna Ribeiro) - transcript		H			
193					Photos (Baby Trend car seat) [RIBEIRO.0321-0432]					
194					Photos (Arthur Hoffmann, P.E.)		O (late)			
195					Photos (Terry Stentz / Kelli Herstein)		O (late)			
196					Photos (Ted Sokol, P.E.)					
197					Photos (Car Seat Inspection) (04/06/2016) [Ribeiro.EP0001-0332]					
198					Photos (Car Seat Inspection) (01/18/2017) [Ribeiro.EP0333-0739]					
199					Photos (Car Seat Inspection) (01/18/2017) [RibeiroInspection.001-153] (Prange photos)					
200					Video (Car Seat Inspection) (04/06/2016)		H (obj. to audio commentary)			
201					Video (Car Seat Inspection) (01/18/2017)		H (obj. to audio commentary)			
202					Photos (Alex and Lucas Ribeiro) [Ribeiro.0433-0452]		R (sibling)			
203					Photos (Lucas Ribeiro) [PHOTOS.001-019]					
204					Photos (Lucas Ribeiro) [RIBEIRO.0001-0318]					
205					Photos (Ribeiro family)		U			
206				133	Photos (taken by Kathie Allison) [Depo. Ex. 133, pp. 3-10, 58]					
207					Photos (Medical Supplies)					

					[RIBEIRO.0453-0462]					
208					Video (Day in Life of Lucas)		H			
209					Baby Trend Website (CRS products) (03-13-06)		H, R (other products)			
210					Baby Trend Website (strollers) (03-13-06)		H, R (other products)			
211					Affidavit (Brad Mattarocci) [Filing No. 475-13]					
212					Affidavit (Chip Whalen) [Filing No. 475-14]					
213					Affidavit (Denny Tsai) [Filing No. 475-15]					
214					Baby Trend Car Seat involved in accident		O (demonstrative only)			
215					Lerado Test Reports (Lerado.0244-0263)					
216					Photos (MGA sled tests) [BT.DocProd.11001-11006]					
217					Photos (MGA sled tests) [BT.DocProd.12948-12955]					
218					Registration Card (unredacted)					
219					10-23-02 Ltr. from Chip Whalen [BT.MDC.File.388]					
220					06-05-06 Ltr. from Mark Sedlack [BT.MDC.File.390]					
221					MDC Consultant Agreement Summary [BT.MDC.File.369]					
222					Royalty Agreement (Baby Trend / MDC) [BT.MDC.File.53]					
223					Royalty Agreement Settlement (BT / MDC) [BT.MDC.File.54]					
224					Royalty Payments (MDC) [BT.MDC.File. -- various Bates stamps]					
225					Royalty Payments Spreadsheet (MDC) [BT.MDC.File. -- various Bates stamps]					
226					Lerado Car Seat Production Details (#2) [BT.MDC.File.443-457]					
227					Baby Trend Production Summary (2002-2007)					

					[BT.MDC.File.394-95]					
228					Medical Records (American Med Response) [AMR.001-021]		H, O (spec., 702), FD (objs. to parts)			
229					Medical Records (Apria Healthcare, Inc.) [APRIA.001-075]		H, O (spec., 702), FD (objs. to parts)			
230					Medical Records (Children's Develop. Clinic) [CDC.CLINIC.001-249]		H, O (spec., 702), FD (objs. to parts)			
231					Medical Records (Children's Home Health) [CHILDRENSHOMEHEALTH.001-196]		H, O (spec., 702), FD (objs. to parts)			
232					Medical Records (Children's Hospital) [CMH.0001-0925]		H, O (spec., 702), FD (objs. to parts)			
233					Medical Records (Children's Physicians) [RIZAL.001-125]		H, O (spec., 702), FD (objs. to parts)			
234					Medical Records (Children's Specialty Phys.) [CSP.0001-0053]		H, O (spec., 702), FD (objs. to parts)			
235					Medical Records (Craig Home Care) [CRAIG.001-414]		H, O (spec., 702), FD (objs. to parts)			
236					Medical Records (ENT Specialists, P.C.) [ENT.001-083]		H, O (spec., 702), FD (objs. to parts)			
237					Medical Records (Family Physical Therapy) [FPT.00001-00395]		H, O (spec., 702), FD (objs. to parts)			
238					Medical Records (Good Samaritan Hospital) [GSH.0001-0090]		H, O (spec., 702), FD (objs. to parts)			

239					Medical Records (Great Plains Radiology) [GPR.001-009]	H, O (spec., 702), FD (objs. to parts)			
240					Medical Records (Hangar Clinic) [HANGER.001-013]	H, O (spec., 702), FD (objs. to parts)			
241					Medical Records (Kearney Clinic, P.C.) [KC.0001-0209]	H, O (spec., 702), FD (objs. to parts)			
242					Medical Records (Kids On the Move) [KIDSONTHE MOVE.001-045]	H, O (spec., 702), FD (objs. to parts)			
243					Medical Records (Madonna Rehab Hospital) [Madonna.0001-0061]	H, O (spec., 702), FD (objs. to parts)			
244					Medical Records (Maxim Healthcare) [MAXIM.0001-1271]	H, O (spec., 702), FD (objs. to parts)			
245					Medical Records (NPPI Anesthesiology) [NPPI.001-052]	H, O (spec., 702), FD (objs. to parts)			
246					Medical Records (Orthomedics Omaha) [ORTHOMEDICS.001-010]	H, O (spec., 702), FD (objs. to parts)			
247					Medical Records (Rehabilitation Specialists) [REHAB.SP.001-022]	H, O (spec., 702), FD (objs. to parts)			
248					Medical Records (Total Respiratory & Rehab) [TRR.001-091]	H, O (spec., 702), FD (objs. to parts)			
249					Medical Records (Lucas Ribeiro)	H, O (spec., 702), FD (objs. to parts)			
250					Medical Bills [MEDICAL.BILLS.0001-1269]				

251					Medical Bills (Children's Home Health) [Children's.Home.Healthcare.Bill.for.March.2007 001-002]					
252					Medical Bills (Lucas Ribeiro)		U			
253					Summary of Medical Bills					
254					Mortality / Life Tables		U			
255					Records (Elkhorn Public Schools) [ELKHORN.PUBLIC.SCHOOLS.001-038]		H, O (spec., 702), FD (objs. to parts)			
256					Records (Kearney Public Schools) [KEARNEY PUBLIC SCHOOLS 001-054]		H, O (spec., 702), FD (objs. to parts)			
257					Records (Millard Public Schools) [MILLARD.PUBLIC.SCHOOLS.001-027]		H, O (spec., 702), FD (objs. to parts)			
258					Records (Munroe Meyer Institute) [MUNROE MEYER 001-020]		H, O (spec., 702), FD (objs. to parts)			
259					Records (Omaha Public Schools) [OMAHA.PUBLIC.SCHOOLS.001-406]		H, O (spec., 702), FD (objs. to parts)			
260					Kearney Hub newspaper article		H, R			
261					U.S. CPSC Report: "Nursery Product- Related Injuries and Deaths" (Nov. 2010)		H, R, FD (other incidents)			
262					U.S. CPSC Report: "Hand-Held Infant Carriers" (11-07-2012)		H, R, FD (other incidents)			
263					U.S. CPSC Report: "Draft Final Rule for Hand-Held Infant Carriers" (10-30-2013)		H, R, FD (other incidents)			
264					Rule 1006 Summaries		U			
265					Curriculum Vitae (Arthur Hoffmann, P.E.)		H			
266					Expert Report (Arthur Hoffmann, P.E.)		H, O (702)			
267					Expert Rebuttal Report (Art Hoffmann, P.E.)		H, O (late, improper rebuttal, 702)			

268				Curriculum Vitae (Terry Stentz, Ph.D.)	H			
269				Expert Report (Stentz and Herstein, Ph.D.)	H, O (702)			
270				Expert Rebuttal Report (Terry Stentz, Ph.D.)	H, O (late, improper rebuttal, 702)			
271				Curriculum Vitae (Kelli Herstein, Ph.D.)	H			
272				Expert Rebuttal Report (Kelli Herstein, Ph.D.)	H, O (late, improper rebuttal, 702)			
273				Curriculum Vitae (Ted Sokol, P.E.)	H			
274				Expert Rebuttal Report (Ted Sokol, P.E.)	H, O (improper rebuttal)			
275				Curriculum Vitae (Prashant Joshi, M.D.)	H			
276				Expert Report (Prashant Joshi, M.D.)	H			
277				Expert Rebuttal Report (Prashant Joshi, M.D.)	H, O (late, improper rebuttal)			
278				Curriculum Vitae (Kathie Allison)	H			
279				Expert Report (Kathie Allison)	H			
280				Expert Rebuttal Report (Kathie Allison)	H, O (late, improper rebuttal)			
281				Life Care Plan (revised) (Kathie Allison)	H, O (late)			
282				Curriculum Vitae (John Ward, Ph.D.)	H			
283				Expert Report (John Ward, Ph.D.)	H			
284				Expert Rebuttal Report (John Ward, Ph.D.)	H, O (late, improper rebuttal)			
285				Depo Transcript/Video (Baby Trend) (2015)				
286				Depo Transcript/Video (Baby Trend) (2016)				
287				Depo Transcript/Video (Chip Whalen)				
288				Depo Transcript/Video (Denny Tsai)				
289				Depo Transcript/Video (Betty Tsai)				
290				Depo Transcript/Video (MDC)				

291					Depo Transcript/Video (IMMI)					
292					Depo Transcript/Video (Lerado Zhong Shan)					
293					Depo Transcript/Video (Lerado Group Hldg.)					
294					Depo Transcript/Video (Lerado Defs.) (2016)					
295					Depo Transcript/Video (Gnotec)					
296					Depo Transcript/Video (Deanna Ribeiro) (#1)		H			
297					Depo Transcript/Video (Deanna Ribeiro) (#2)		H			
298					Depo Transcript/Video (Franco Ribeiro)		H			
299					Depo Transcript/Video (Melody Gough)					
300					Depo Transcript/Video (Elias Abdallah)					
301					Depo Transcript/Video (Tara Abdallah)					
302					Depo Transcript/Video (Karen Lewandowski)					
303					Depo Transcript/Video (Michael Lewandowski)					
304					Depo Transcript/Video (David Sesna)					
305					Depo Transcript/Video (Michael Young)					
306					Depo Transcript/Video (Joshua Salter)					
307					Depo Transcript/Video (Dennis Hill)					
308					Depo Transcript/Video (Jeff Dowling)					
309					Depo Transcript/Video (Betty Lewis)					
310					Depo Transcript/Video (Christopher Jarmin)					
311					Depo Transcript/Video (Joseph Graf)					
312					Depo Transcript/Video (Bill Maendele)					
313					Depo Transcript/Video (Jamie Cummings)					
314					Depo Transcript/Video (Jaqueline Liess)					
315					Depo Transcript/Video (Karen Triplett)					
316					Depo Transcript/Video (Art Hoffmann, P.E.)		H			

317				Depo Transcript/Video (Terry Stentz, Ph.D.)	H			
318				Depo Transcript/Video (Kelli Herstein, Ph.D.)	H			
319				Depo Transcript/Video (Ted Sokol, P.E.)	H			
320				Depo Transcript/Video (Dawn Murray, M.D.)				
321				Depo Transcript/Video (Angela Kratochvil, M.D.)				
322				Depo Transcript/Video (Katherine Keifer, M.D.)				
323				Depo Transcript/Video (Suzanne Haney, M.D.)				
324				Depo Transcript/Video (Chandrika Rizal, M.D.)				
325				Depo Transcript/Video (Fernando Zapata, M.D.)				
326				Depo Transcript/Video (Prashant Joshi, M.D.)	H			
327				Depo Transcript/Video (Kathie Allison)	H			
328				Depo Transcript/Video (John Ward, Ph.D.)	H			
329				Depo Transcript/Video (William Van Arsdell)	H			
330				Depo Transcript/Video (James Chinni)	H			
331				Depo Transcript/Video (Michael Prange)	H			
332				Materials considered by Art Hoffmann, P.E., in conjunction with his expert reports	U, H, FD			
333				Materials considered by Terry Stentz, Ph.D., in conjunction with his expert reports	U, H, FD			
334				Materials considered by Kelli Herstein, Ph.D., in conjunction with her expert reports	U, H, FD			
335				Materials considered by Ted Sokol, P.E., in conjunction with his expert report	U, H, FD			

336				Materials considered by Prashant Joshi, M.D., in conjunction with his expert reports	U, H, FD			
337				Materials considered by Kathie Allison in conjunction with her expert reports	U, H, FD			
338				Materials considered by John Ward, Ph.D., in conjunction with his expert reports	U, H, FD			
339				Lerado's Rule 26(a)(1) Disclosures	H			
340				Lerado's Rule 26(a)(1) Disclosures (Supp. #1)	H			
341				Lerado's Rule 26(a)(1) Disclosures (Supp. #2)	H			
342				Lerado's Answers to Interrogatories	H			
343				Lerado's Response to RFPD	H			
344				Lerado's Response to RFPD (Supp. #1)	H			
345				Lerado's Response to RFPD (Supp. #2)	H			
346				Lerado Documents [Lerado.0001-0396]	O (for. lang.)			
347				Other exhibits necessary to refute or support anything else that comes up in discovery	U			
348				Baby Trend exemplar car seats / components	U			
349				Exemplar car seats / components	U			
350				CAMI Dummy	U			
351				Videos (Infants Self-Rocking in Car Seats)	U			
352				Videos (Infants in Bouncers)	U, R			
353				Demonstrative exhibits for Art Hoffmann, P.E.	U			
354				Demonstrative exhibits for Terry Stentz, Ph.D.	U			
355				Demonstrative exhibits for Kelli Herstein, Ph.D.	U			
356				Demonstrative exhibits for Ted Sokol, P.E.	U			

357				Demonstrative exhibits for Prashant Joshi, M.D.	U			
358				Demonstrative exhibits for Kathie Allison	U			
359				Demonstrative exhibits for John Ward, Ph.D.	U			
360				Radiology Imaging of Lucas	U			
361				Demonstrative exhibits (human body)	U			
362				Demonstrative exhibits (past med procedures)	U			
363				Demonstrative exhibits (Lucas' injuries/illnesses)	U			
364				Demonstrative exhibits (med. equip / supplies)	U			
365				Demonstrative exhibit (medications)	U			
366				Demonstrative exhibit (oxygen tank)	U			
367				Demonstrative exhibit (nebulizer)	U			
367				Demonstrative exhibit (suction and supplies)	U			
368				Demonstrative exhibit (trach care)	U			
369				Demonstrative exhibit (trach oxygen trap)	U			
370				Demonstrative exhibit (formula)	U			
371				Demonstrative exhibit (feeding tube)	U			
372				Demonstrative exhibit (feeding pump)	U			
373				Demonstrative exhibit (feeding supplies)	U			
374				Demonstrative exhibit (diapers)	U			
375				Demonstrative exhibit (leg bag)	U			
376				Demonstrative exhibit (hand splints)	U			
377				Demonstrative exhibit (ankle foot orthoses)	U			
378				Demonstrative exhibit (GJ button)	U			
379				Demonstrative exhibit (wheelchair)	U			
380				Demonstrative exhibit (stander)	U			
381				Demonstrative exhibit (Botox injection needle)	U			
382				Demonstrative exhibit (Baclofen pump)	U			

383				Demonstrative exhibits (future med proceeds.)		U			
384				Calendars (years 2000 - 2040)		R			

OBJECTIONS

R: Relevancy

H: Hearsay

A: Authenticity

O: Other (specify)

U: Unavailable for Inspection (all objections reserved)

FD: Foundation

Plaintiffs reserve the right to use any and all exhibits listed by any of the Defendants on their Exhibit Lists, as well as any and all documents necessary for impeachment or rebuttal.

Plaintiffs reserve the right to amend their Exhibit List as necessary based on documents not yet received but produced in ongoing discovery or depositions or pursuant to subpoena.

Plaintiffs reserve the right to offer any and all exhibits necessary for the purpose of authentication or laying foundation, as necessary.

Plaintiffs reserve the right to supplement their Exhibit List with demonstrative exhibits, as necessary.

FRANCO RIBEIRO and DEANNA RIBEIRO,
as individuals and biological parents and next
friends of LUCAS RIBEIRO, an infant,
Plaintiffs,

By: /s/ Michael F. Coyle
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Plaintiff's Exhibit List was filed electronically with the United States District Court for the District of Nebraska on March 17, 2017, using the CM/ECF system which sent notification of such filing to the following:

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By: /s/ Michael F. Coyle, #18299

19197-51429/1654062

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA RIBEIRO,)
as individuals and as next friends and)
biological parents of LUCAS RIBEIRO, an)
infant,)

Plaintiffs,)

vs.)

BABY TREND, INC., et al.)

Defendants.)

Case No. 8:12-cv-00204

**PLAINTIFFS' AMENDED
EXHIBIT LIST WITH
LERADO'S OBJECTIONS**

COME NOW Plaintiffs, Franco Ribeiro and Deanna Ribeiro, by and through their
counsel, and hereby submit the following amended exhibit list, subject to offer:

Trial Date: April 24, 2017

EXHIBIT NUMBERS					DESCRIPTION	OFF	OBJ	RCVD	NOT RCVD	DATE
PLF	BT/ MDC	IMMI	LER	DEP						
1				1	Notice to Take Depo. (Millennium Develop.)					
2				2	Resume (Mark Sedlack)		H			
3				3	MDC's Answers to Interrogatories					
4				4	Patent for Car Seat (Sedlack) (05-09-06)					
5				5	Patent for Car Seat (Sedlack) (02-28-06)					
6				6	Patent for Car Seat (Sedlack) (12-27-05)					
7				7	Patent for Car Seat (Sedlack) (07-12-05)					
8				8	Patent for Car Seat (Sedlack) (07-05-05)					
9				9	Patent for Car Seat (Sedlack) (12-28-04)					
10				10	Patent for Car Seat (Sedlack) (11-02-04)					
11				11	Photos (Baby Trend car seat)					
12				12	Owner's Manual for Flex-Loc Car Seat (01.04)					
13				13	Owner's Manual for Flex-Loc Car Seat (01.05)					
14				14	Owner's Manual for Flex-Loc Car Seat (01.06)					
15				15	Consultant Agreement (05-13-03)					
16				16	Consultant Agreement (03-03-00)					

17				17	Car Seat Project Schedule					
18				18	Car Seat Documents from Mark Sedlack [MDC00741-780]					
19				19	Photos (alternative harness for car seat)					
20				20	Patent Information (chest clip) [MDC00016-24]					
21				21	11-11-05 Email between Defendants					
22				22	09-14-05 Email between Defendants					
23				23	10-27-05 Email between Defendants					
24				24	10-11-05 Email between Defendants					
25				25	Photo (MGA post-test crash)					
26				26	ASTM F2050-13a					
27				27	Lerado Car Seat Production Details					
28				28	Patent Drawings (Latch-Loc car seat)					
29				29	Photos (crotch buckle)					
30				30	Baby Trend Product Catalog (2006-07)					
31				31	Instruction Manual (Trendsport Trav.) (06-06)					
32				32	Patent Overview (Latch-Loc car seat - travel)		H			
33				33	Product Description (Latch-Loc car seat)					
34				34	Revisions to FMVSS 213 (08-01-05)					
35				35	Crash-test Matrix Data (04-12-7)					
36				36	NHTSA Test Report (Flex-Loc 6325) (06-02-06)					
37				37	NHTSA Test Report (Flex-Loc 6325) (07-24-06)					
38				38	Photo (European car seat)					
39				39	Photo (European car seat)					
40				40	Notice to Take Depo (Baby Trend)					
41				41	Baby Trend Customer Support Log (12-20-11)					
42				42	News Report (Alpha Group acquisition)					
43				43	Lerado Car Seat Production Agreement					
44				44	Baby Trend's Answers to Rogs					
45				45	Baby Trend's Answers to Rogs (Supp. #1)					
46				46	Baby Trend's Answers to Rogs (Supp. #2)					
47				47	Lerado Organizational Charts					
48				48	05-09-12 Ltr. from Fraser Stryker		H			
49				49	Instruction Manual (Trendsport Trav.) (07-05)					
50				50	Baby Trend's Rule 26(a)(1) Initial Disclosures					

51			51	Indiana Mills Documents (IMMI.0001-0139) [Plaintiffs will not offer IMMI.0137-0139.]					
52			52	Gnotec Documents					
53			53	Notice to Take Depo (IMMI)					
54			54	Photos (A-Lok adjuster strap)					
55			55	Document Retention Policy (IMMI)					
56			56	Notice to Take Depo (Deanna Ribeiro)					
57			58	Photos (Baby Trend car seat) (04-06-16)					
58			59	Photos (taken from accident scene by KPD)					
59			61	Safe Kids Checklist (Baby Trend car seat)					
60			62	Google Map (Ribeiro home)					
61			64	Drawing (Ribeiro home)					
62			65	Google Map (Ribeiro home)					
63			66	Google Map (Ribeiro home)					
64			67	Records (Kearney Police Department)					
65			67C	Police Interview (Deanna Ribeiro)		H			
66			67D	Police Interview (Franco Ribeiro)		H			
67			68	Records (Good Samaritan Hospital)					
68			69	Records (Kearney Clinic, P.C.)					
69			70	Curriculum Vitae (Dawn Murray, M.D.)		H			
70			71	Curriculum Vitae (Angela Kratochvil, M.D.)		H			
71			72	Curriculum Vitae (Katherine Keifer, M.D.)		H			
72			73	Good Samaritan H & P					
73			74	Good Samaritan ER record					
74			75	Good Samaritan discharge page					
75			76	Good Samaritan progress note					
76			77, p. 24-27, 31-38	Records (Safe Kids Platte Valley)					
77			78	Safe Kids Checklist Form					
78			79	Safe Kids Checklist (Baby Trend car seat)					
79			80	Notes (Officer Dowling)					
80			81	Photo (accident scene)					
81			82	Curriculum Vitae (Chandrika Rizal, M.D.)		H			
82			83	Medical Records (Chandrika Rizal, M.D.)					
83			84	Office Visit (Chandrika Rizal, M.D.) (06-21-16)					
84			85	Office Visit (Chandrika Rizal, M.D.) (04-18-16)					

85			86	Medical Bills (Lucas Ribeiro)					
86			87	Curriculum Vitae (Suzanne Haney, M.D.)		H			
87			88	Medical Records (Children's Hospital / Phys.)					
88			89	Consult Note (Suzanne Haney) (05-28-11)					
89			90	Baby Trend Call Logs (Model #6325)					
90			91	Child Restraint Registration Card (redacted)					
91			92	Notice to Take Depo (Lerado)					
92			93	Plaintiffs' Complaint (7th Amended)		H/O Arg.			
93			94	Lerado's Answer to Complaint (7th Amended)		H/O Arg.			
94			95	Lerado Company Profile (05-14-06)		H			
95			96	Baby Trend Documents		F			
96			97	LinkedIn Profile (Roger Hsu)					
97			98	Lerado Specification Manual					
98			99	Lerado Invoice (06-05-07)					
99			100	Lerado Car Seat Issues Spreadsheet					
100			102	Lerado Test Reports (Lerado.0218-0243)					
101			103	Photos (car seats)					
102			104	Lerado Parts Agreements (March 22, 2007)					
103			105	Lerado documents (Lerado.0273-0278)					
104			106	Lerado documents (Lerado.0279-0290)					
105			107	Lerado Patent List					
106			108	MDC documents					
107			109	Baby Trend Purchase Orders					
108			110	Notice to Take Depo (Denny Tsai)					
109			111	Baby Trend Website (02-23-06)		H			
110			112	Baby Trend Website (02-05-06)		H			
111			113	Baby Trend Website (03-13-06)		H			
112			114	Owner's Manual for Flex-Loc Car Seat (01.04)					
113			115	Baby Trend Website (10-15-07)		H			
114			116	Baby Trend Call Logs					
115			117	Emails between Defendants					
116			119	Expert Report (Arthur Hoffmann, P.E.)		H			
117			121	Curriculum Vitae (Arthur Hoffmann, P.E.)		H			
118			124	Expert Report (Kathie Allison)		H			

119			125	Curriculum Vitae (Kathie Allison)		H			
120			126	Expert Report (Prashant Joshi, M.D.)		H			
121			130	Curriculum Vitae (Kathie Allison)		H			
122			131	Expert Report (revised) (Kathie Allison)		H			
123			135	Expert Report (John Ward, Ph.D.)		H			
124			137	Summary of Economic Loss (Lucas Ribeiro)		O Arg			
125			138	Educational Attainment (females)		H			
126			138A	Educational Attainment (males)		H			
127			140	Expert Report (Kathie Allison)		H			
128			143	Curriculum Vitae (Fernando Zapata, M.D.)		H			
129			144	Medical Records					
130			145	Medical Records (CDC Clinic) [CDC.CLINIC.0244-0249]					
131			146	Progress Note (08-11-2012)					
132			148	Expert Report (Terry Stentz / Kelli Herstein)		H			
133			150	Curriculum Vitae (Terry Stentz, Ph.D.)		H			
134			151	Expert File (Terry Stentz, Ph.D.)		H			
135			151A	Registration Card (Kassidy Hurlbutt)					
136			151B	Photos (Baby Trend car seat)					
137			151D	Additional Info. (Kelli Herstein, Ph.D.)		H			
138			154	Expert Rebuttal Report (Kelli Herstein, Ph.D.)		H			
139			175	Notice to Take Depo (William Van Arsdell)					
140			176	Response to Depo. Notice (Van Arsdell)					
141			178, p. 2846- 2857	Invoices (Van Arsdell)					
142			185	Notice to Take Depo (James Chinni)					
143			187	Invoices (James Chinni)					
144			188	Photos (Baby Trend Car Seat)					
145			189	Inspection Report (Julia King)					
146			190	Product Description Sheet (A38042A)					
147			191	Product Description Sheet (F14193)					
148			192	Invoices (Michael Prange)					
149			193	Photos (Baby Trend car seat)					
150			194	Photos (two babies)					
151			196	CAMI 6-Month Old Dummy Information					

152			197	Photos (CAMI Dummy)					
153			200	Expert Report (Ted Sokol, P.E.)		H			
154			201	Expert File (Ted Sokol, P.E.)		H			
155			1	Lerado Car Seat Production Agreement (Depo of Baby Trend, 06-23-2015)					
156			2	Baby Trend's Answers to Interrogatories (Depo of Baby Trend, 06-23-2015)					
157			5	Communications on OPP Car Seat (Depo of Baby Trend, 06-23-2015)					
158			6	Communications with Lerado (Depo of Baby Trend, 06-23-2015)					
159			7	Communications with Lerado (Depo of Baby Trend, 06-23-2015)					
160			8	Communications with Lerado (Depo of Baby Trend, 06-23-2015)					
161			1	Corporate Structure (Kendrion) (Depo of Gnotec, 06-24-2015)					
162			2	Invoices (Kendrion) (Depo of Gnotec, 06-24-2015)					
163			3	Spreadsheet (buckle information) (Depo of Gnotec, 06-24-2015)					
164			4	Corporate Structure (Kendrion / Gnotec) (Depo of Gnotec, 06-24-2015)					
165			1	Notice to Take Depo (Lerado Zhong Shan) (Depo of Lerado Zhong Shan, 08-19-2015)					
166			2	Lerado Car Seat Production Agreement (Depo of Lerado Zhong Shan, 08-19-2015)					
167			4	Invoice (Kendrion) (Depo of Lerado Zhong Shan, 08-19-2015)					
168			1	Notice to Take Depo (Lerado Group Holding) (Depo of Lerado Group Holding, 11-11-2015)					
169			2	Notice to Take Depo (Lerado China Limited) (Depo of Lerado Group Holding, 11-11-2015)					
170			3	Notice to Take Depo (Lerado Group Co. Ltd.) (Depo of Lerado Group Holding, 11-11-2015)					
171			4	Notice to Take Depo (Lerado H.K. Limited) (Depo of Lerado Group Holding, 11-11-2015)					
172			5	Lerado Car Seat Production Agreement (Depo of Lerado Group Holding, 11-11-2015)					
173			6	Lerado Organizational Chart					

					(Depo of Lerado Group Holding, 11-11-2015)					
174				7	Meeting Minutes (Lerado China Limited) (Depo of Lerado Group Holding, 11-11-2015)					
175				8	Lerado Group Holding Annual Report (2006) (Depo of Lerado Group Holding, 11-11-2015)					
176				12	Stock Certificate (Lerado Group Limited) (Depo of Lerado Group Holding, 11-11-2015)		F/H			
177				13	Delaware SOS Listing (Lerado Success, Inc.) (Depo of Lerado Group Holding, 11-11-2015)		F			
178				14	Pennsylvania SOS Listing (Lerado Success) (Depo of Lerado Group Holding, 11-11-2015)		F			
179				15	Stock Certificate (Mia Moda Inc.) (Depo of Lerado Group Holding, 11-11-2015)		F/H			
180				16	Pennsylvania SOS Listing (Mia Moda Inc.) (Depo of Lerado Group Holding, 11-11-2015)		F			
181				17	South Carolina SOS Listing (Mia Moda Inc.) (Depo of Lerado Group Holding, 11-11-2015)		F			
182				18	10-31-07 Ltr. from Mia Moda Inc. to NHTSA (Depo of Lerado Group Holding, 11-11-2015)		F/H			
183				19	NHTSA Consumer Advisory (Lerado recall) (Depo of Lerado Group Holding, 11-11-2015)		O 404			
184				20	Lerado document (chest clip) (Depo of Lerado Group Holding, 11-11-2015)					
185				22	Lerado Group Holdings Customer List (Depo of Lerado Group Holding, 11-11-2015)					
186				23	Invoice (Kendrion) (Depo of Lerado Group Holding, 11-11-2015)					
187				26	NHTSA Recall Information (Lerado recall) (Depo of Lerado Group Holding, 11-11-2015)		O 404			
188				28	Invoices (Kendrion) (Depo of Lerado Group Holding, 11-11-2015)					
189					Photos (KPD - accident scene) [KPD.0001-0263]					
190					Photos (KPD - at station) [PHOTOS.020-050]					
191					Police Interview (Deanna Ribeiro) - audio		H			
192					Police Interview (Deanna Ribeiro) - transcript		H			
193					Photos (Baby Trend car seat) [RIBEIRO.0321-0432]					
194					Photos (Arthur Hoffmann, P.E.)					

195					Photos (Terry Stentz / Kelli Herstein)					
196					Photos (Ted Sokol, P.E.)					
197					Photos (Car Seat Inspection) (04/06/2016) [Ribeiro.EP0001-0332]					
198					Photos (Car Seat Inspection) (01/18/2017) [Ribeiro.EP0333-0739]					
199					Photos (Car Seat Inspection) (01/18/2017) [RibeiroInspection.001-153] (Prange photos)					
200					Video (Car Seat Inspection) (04/06/2016)					
201					Video (Car Seat Inspection) (01/18/2017)					
202					Photos (Alex and Lucas Ribeiro) [Ribeiro.0433-0452]					
203					Photos (Lucas Ribeiro) [PHOTOS.001-019]					
204					Photos (Lucas Ribeiro) [RIBEIRO.0001-0318]					
205					Photos (Ribeiro family)					
206				133	Photos (taken by Kathie Allison) [Depo. Ex. 133, pp. 3-10, 58]					
207					Photos (Medical Supplies) [RIBEIRO.0453-0462]					
208					Video (Day in Life of Lucas)					
209					Baby Trend Website (CRS products) (03-13-06)					
210					Baby Trend Website (strollers) (03-13-06)					
211					Affidavit (Brad Mattarocci) [Filing No. 475-13]					
212					Affidavit (Chip Whalen) [Filing No. 475-14]					
213					Affidavit (Denny Tsai) [Filing No. 475-15]					
214					Baby Trend Car Seat involved in accident					
215					Lerado Test Reports (Lerado.0244-0263)					
216					Photos (MGA sled tests) [BT.DocProd.11001-11006]					
217					Photos (MGA sled tests) [BT.DocProd.12948-12955]					
218					Registration Card (unredacted)					
219					10-23-02 Ltr. from Chip Whalen [BT.MDC.File.388]					

220					06-05-06 Ltr. from Mark Sedlack [BT.MDC.File.390]					
221					MDC Consultant Agreement Summary [BT.MDC.File.369]	H				
222					Royalty Agreement (Baby Trend / MDC) [BT.MDC.File.53]					
223					Royalty Agreement Settlement (BT / MDC) [BT.MDC.File.54]					
224					Royalty Payments (MDC) [BT.MDC.File. -- various Bates stamps]					
225					Royalty Payments Spreadsheet (MDC) [BT.MDC.File. -- various Bates stamps]					
226					Lerado Car Seat Production Details (#2) [BT.MDC.File.443-457]					
227					Baby Trend Production Summary (2002-2007) [BT.MDC.File.394-95]					
228					Medical Records (American Med Response) [AMR.001-021]					
229					Medical Records (Apria Healthcare, Inc.) [APRIA.001-075]					
230					Medical Records (Children's Develop. Clinic) [CDC.CLINIC.001-249]					
231					Medical Records (Children's Home Health) [CHILDRENSHOMEHEALTH.001-196]					
232					Medical Records (Children's Hospital) [CMH.0001-0925]					
233					Medical Records (Children's Physicians) [RIZAL.001-125]					
234					Medical Records (Children's Specialty Phys.) [CSP.0001-0053]					
235					Medical Records (Craig Home Care) [CRAIG.001-414]					
236					Medical Records (ENT Specialists, P.C.) [ENT.001-083]					
237					Medical Records (Family Physical Therapy) [FPT.00001-00395]					
238					Medical Records (Good Samaritan Hospital) [GSH.0001-0090]					
239					Medical Records (Great Plains Radiology) [GPR.001-009]					

240					Medical Records (Hangar Clinic) [HANGER.001-013]					
241					Medical Records (Kearney Clinic, P.C.) [KC.0001-0209]					
242					Medical Records (Kids On the Move) [KIDSONTHE MOVE.001-045]					
243					Medical Records (Madonna Rehab Hospital) [Madonna.0001-0061]					
244					Medical Records (Maxim Healthcare) [MAXIM.0001-1271]					
245					Medical Records (NPPI Anesthesiology) [NPPI.001-052]					
246					Medical Records (Orthomedics Omaha) [ORTHOMEDICS.001-010]					
247					Medical Records (Rehabilitation Specialists) [REHAB.SP.001-022]					
248					Medical Records (Total Respiratory & Rehab) [TRR.001-091]					
249					Medical Records (Lucas Ribeiro)					
250					Medical Bills [MEDICAL.BILLS.0001-1269]					
251					Medical Bills (Children's Home Health) [Children's.Home.Healthcare.Bill.for.March.2007 001-002]					
252					Medical Bills (Lucas Ribeiro)					
253					Summary of Medical Bills					
254					Mortality / Life Tables					
255					Records (Elkhorn Public Schools) [ELKHORN.PUBLIC.SCHOOLS.001-038]					
256					Records (Kearney Public Schools) [KEARNEY PUBLIC SCHOOLS 001-054]					
257					Records (Millard Public Schools) [MILLARD.PUBLIC.SCHOOLS.001-027]					
258					Records (Munroe Meyer Institute) [MUNROE MEYER 001-020]					
259					Records (Omaha Public Schools) [OMAHA.PUBLIC.SCHOOLS.001-406]					
260					Kearney Hub newspaper article					
261					U.S. CPSC Report: "Nursery Product-Related Injuries and Deaths" (Nov. 2010)		H/ 1006			
262					U.S. CPSC Report: "Hand-Held Infant		H/			

				Carriers" (11-07-2012)	1006			
263				U.S. CPSC Report: "Draft Final Rule for Hand-Held Infant Carriers" (10-30-2013)	H/ 1006			
264				Rule 1006 Summaries	1006			
265				Curriculum Vitae (Arthur Hoffmann, P.E.)	H			
266				Expert Report (Arthur Hoffmann, P.E.)	H/O 702			
267				Expert Rebuttal Report (Art Hoffmann, P.E.)	H/O 702			
268				Curriculum Vitae (Terry Stentz, Ph.D.)	H			
269				Expert Report (Stentz and Herstein, Ph.D.)	H/O 702			
270				Expert Rebuttal Report (Terry Stentz, Ph.D.)	H/O 702			
271				Curriculum Vitae (Kelli Herstein, Ph.D.)	H			
272				Expert Rebuttal Report (Kelli Herstein, Ph.D.)	H/O 702			
273				Curriculum Vitae (Ted Sokol, P.E.)	H			
274				Expert Rebuttal Report (Ted Sokol, P.E.)	H/O 702			
275				Curriculum Vitae (Prashant Joshi, M.D.)	H			
276				Expert Report (Prashant Joshi, M.D.)	H/O 702			
277				Expert Rebuttal Report (Prashant Joshi, M.D.)	H/O 702			
278				Curriculum Vitae (Kathie Allison)	H			
279				Expert Report (Kathie Allison)	H/O 702			
280				Expert Rebuttal Report (Kathie Allison)	H/O 702			
281				Life Care Plan (revised) (Kathie Allison)	H/O 702			
282				Curriculum Vitae (John Ward, Ph.D.)	H			
283				Expert Report (John Ward, Ph.D.)	H/O 702			
284				Expert Rebuttal Report (John Ward, Ph.D.)	H/O 702			
285				Depo Transcript/Video (Baby Trend) (2015)				
286				Depo Transcript/Video (Baby Trend) (2016)				
287				Depo Transcript/Video (Chip Whalen)				
288				Depo Transcript/Video (Denny Tsai)				

289					Depo Transcript/Video (Betty Tsai)					
290					Depo Transcript/Video (MDC)					
291					Depo Transcript/Video (IMMI)					
292					Depo Transcript/Video (Lerado Zhong Shan)					
293					Depo Transcript/Video (Lerado Group Hldg.)					
294					Depo Transcript/Video (Lerado Defs.) (2016)					
295					Depo Transcript/Video (Gnotec)					
296					Depo Transcript/Video (Deanna Ribeiro) (#1)					
297					Depo Transcript/Video (Deanna Ribeiro) (#2)					
298					Depo Transcript/Video (Franco Ribeiro)					
299					Depo Transcript/Video (Melody Gough)					
300					Depo Transcript/Video (Elias Abdallah)					
301					Depo Transcript/Video (Tara Abdallah)					
302					Depo Transcript/Video (Karen Lewandowski)					
303					Depo Transcript/Video (Michael Lewandowski)					
304					Depo Transcript/Video (David Sesna)					
305					Depo Transcript/Video (Michael Young)					
306					Depo Transcript/Video (Joshua Salter)					
307					Depo Transcript/Video (Dennis Hill)					
308					Depo Transcript/Video (Jeff Dowling)					
309					Depo Transcript/Video (Betty Lewis)					
310					Depo Transcript/Video (Christopher Jarmin)					
311					Depo Transcript/Video (Joseph Graf)					
312					Depo Transcript/Video (Bill Maendele)					
313					Depo Transcript/Video (Jamie Cummings)					
314					Depo Transcript/Video (Jaqueline Liess)					
315					Depo Transcript/Video (Karen Triplett)					
316					Depo Transcript/Video (Art Hoffmann, P.E.)					
317					Depo Transcript/Video (Terry Stentz, Ph.D.)					
318					Depo Transcript/Video (Kelli Herstein, Ph.D.)					
319					Depo Transcript/Video (Ted Sokol, P.E.)					
320					Depo Transcript/Video (Dawn Murray, M.D.)					
321					Depo Transcript/Video (Angela Kratochvil, M.D.)					
322					Depo Transcript/Video (Katherine Keifer, M.D.)					
323					Depo Transcript/Video (Suzanne Haney, M.D.)					
324					Depo Transcript/Video (Chandrika Rizal, M.D.)					

325					Depo Transcript/Video (Fernando Zapata, M.D.)					
326					Depo Transcript/Video (Prashant Joshi, M.D.)					
327					Depo Transcript/Video (Kathie Allison)					
328					Depo Transcript/Video (John Ward, Ph.D.)					
329					Depo Transcript/Video (William Van Arsdell)					
330					Depo Transcript/Video (James Chinni)					
331					Depo Transcript/Video (Michael Prange)					
332					Materials considered by Art Hoffmann, P.E., in conjunction with his expert reports		H			
333					Materials considered by Terry Stentz, Ph.D., in conjunction with his expert reports		H			
334					Materials considered by Kelli Herstein, Ph.D., in conjunction with her expert reports		H			
335					Materials considered by Ted Sokol, P.E., in conjunction with his expert report		H			
336					Materials considered by Prashant Joshi, M.D., in conjunction with his expert reports		H			
337					Materials considered by Kathie Allison in conjunction with her expert reports		H			
338					Materials considered by John Ward, Ph.D., in conjunction with his expert reports		H			
339					Lerado's Rule 26(a)(1) Disclosures		H			
340					Lerado's Rule 26(a)(1) Disclosures (Supp. #1)					
341					Lerado's Rule 26(a)(1) Disclosures (Supp. #2)					
342					Lerado's Answers to Interrogatories					
343					Lerado's Response to RFPD					
344					Lerado's Response to RFPD (Supp. #1)					
345					Lerado's Response to RFPD (Supp. #2)					
346					Lerado Documents [Lerado.0001-0396]					
347					Other exhibits necessary to refute or support anything else that comes up in discovery		H/F			
348					Baby Trend exemplar car seats / components					
349					Exemplar car seats / components					
350					CAMI Dummy					
351					Videos (Infants Self-Rocking in Car Seats)		H			

352				Videos (Infants in Bouncers)		H			
353				Demonstrative exhibits for Art Hoffmann, P.E.					
354				Demonstrative exhibits for Terry Stentz, Ph.D.					
355				Demonstrative exhibits for Kelli Herstein, Ph.D.					
356				Demonstrative exhibits for Ted Sokol, P.E.					
357				Demonstrative exhibits for Prashant Joshi, M.D.					
358				Demonstrative exhibits for Kathie Allison					
359				Demonstrative exhibits for John Ward, Ph.D.					
360				Radiology Imaging of Lucas					
361				Demonstrative exhibits (human body)					
362				Demonstrative exhibits (past med procedures)					
363				Demonstrative exhibits (Lucas' injuries/illnesses)					
364				Demonstrative exhibits (med. equip / supplies)					
365				Demonstrative exhibit (medications)					
366				Demonstrative exhibit (oxygen tank)					
367				Demonstrative exhibit (nebulizer)					
367				Demonstrative exhibit (suction and supplies)					
368				Demonstrative exhibit (trach care)					
369				Demonstrative exhibit (trach oxygen trap)					
370				Demonstrative exhibit (formula)					
371				Demonstrative exhibit (feeding tube)					
372				Demonstrative exhibit (feeding pump)					
373				Demonstrative exhibit (feeding supplies)					
374				Demonstrative exhibit (diapers)					
375				Demonstrative exhibit (leg bag)					
376				Demonstrative exhibit (hand splints)					
377				Demonstrative exhibit (ankle foot orthoses)					
378				Demonstrative exhibit (GJ button)					
379				Demonstrative exhibit (wheelchair)					
380				Demonstrative exhibit (stander)					
381				Demonstrative exhibit (Botox injection needle)					
382				Demonstrative exhibit (Baclofen pump)					
383				Demonstrative exhibits (future med proceds.)					
384				Calendars (years 2000 - 2040)					

OBJECTIONS

R: Relevancy
H: Hearsay
A: Authenticity
O: Other (specify)
U: Unavailable for Inspection (all objections reserved)
FD: Foundation

Plaintiffs reserve the right to use any and all exhibits listed by any of the Defendants on their Exhibit Lists, as well as any and all documents necessary for impeachment or rebuttal.

Plaintiffs reserve the right to amend their Exhibit List as necessary based on documents not yet received but produced in ongoing discovery or depositions or pursuant to subpoena.

Plaintiffs reserve the right to offer any and all exhibits necessary for the purpose of authentication or laying foundation, as necessary.

Plaintiffs reserve the right to supplement their Exhibit List with demonstrative exhibits, as necessary.

FRANCO RIBEIRO and DEANNA RIBEIRO,
as individuals and biological parents and next
friends of LUCAS RIBEIRO, an infant,
Plaintiffs,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Plaintiff's Exhibit List was filed electronically with the United States District Court for the District of Nebraska on March 17, 2017, using the CM/ECF system which sent notification of such filing to the following:

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19197-51429/1654062

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA RIBEIRO,)
as individuals and as next friends and)
biological parents of LUCAS RIBEIRO,)
an infant,)

Plaintiffs,)

v.)

BABY TREND, INC., ET AL.)

Defendants)

IMMI's AMENDED
LIST OF EXHIBITS

Case Number: 8:12CV204
Courtroom Deputy:
Court Reporter:

Trial Date(s): 4/24/17

SCHEDULE B

Non-highlighted=expects to offer; Highlighted document=may offer

EXHIBIT NO.								
PL	DF	3 PTY	DESCRIPTION	OFF	OBJ	RCVD	NOT RCVD	DATE
	1000		National standard incident report (IMMI 1-23)		FD, H			
	1001		2007 pendulum test data (IMMI 24-81)		FD, H			
	1002		Audit sequence test data (IMMI 82-83)		FD, H			
	1003		Audit sequence test data (IMMI 84-85)		FD, H			
	1004		Test procedure cycling (IMMI 86)		FD, H			
	1005		209 salt spray (IMMI 87-88)		FD, H			
	1006		Audit sequence R44 (IMMI 89-90)		FD, H			
	1007		QALP-0409 (IMMI 91)		FD, H			
	1008		QALP-0114 (IMMI 92)		FD, H			
	1009		Tensile strength (IMMI 93-108)		FD, H			
	1010		Tensile test data (IMMI 109-113)		FD, H			
	1011		Alok micro slip (IMMI 114-126)		FD, H			
	1012		LOT number data (IMMI 127)					

1013		Sales history data (IMMI 128)					
1014		Lerado orders (IMMI 129)					
1015		Lerado orders (IMMI 130)					
1016		CHDC (IMMI 131)					
1017		BOM (IMMI 132)					
1018		Product description sheet (IMMI 133)					
1019		REV history (IMMI 134)					
1020		Quote (IMMI 135-136)					
1021		IMMI inspection photos					
1022		Kearney Police Department photos (KPD 1-263)					
1023		Baby Trend University of Michigan Transportation Research Institute (BT1-10015)		H, A, FD, (ALL)			
1024		Baby Trend BOM's Original Development OPP + 2005 Changes; OPP Files Flex-Loc From Laredo/Airmate 5-2004 (BT10016-10974)		H, A, FD, (ALL)			
1025		Baby Trend MGA Research Corporation; Baby Trend Flex-Loc Model 6373 Child Restraint Tests; Reports, Photos and Videos; Test Date 2/09/05; Baby Trend Flex-Loc Model 6373 Child Restraint Tests; Reports, Photos and Videos; Test Date: 2/28-3/01/05; Baby Trend Flex-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date 6/16-17/05; Baby Trend Flex-Loc Child Restraint Tests; Reports, Photos, Video; Test Date: 7/12/05; Baby Trend Flex-Loc and Latch-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date: 11/18 & 21/05 (BT10975-12364)		H, A, FD, (ALL)			

1026		MGA Research Corporation: Baby Trend Latch-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date: 1/06/06; Baby Trend Latch-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date: 2/27 & 3/07/06; Baby Trend Latch-Loc Child Restraint Test; Reports, Photos, Videos; Test Date: 3/20 & 3/28/06; Baby Trend Latch-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date: 10/23/06; Baby Trend Experimental Mixed Production and Previously Manufactured Product Child Restraint Tests; Reports, Photos, Videos; Test Date: 12/07/06 (BT12365-12755)		H, A, FD, (ALL)			
1027		MGA Research Corporation; Baby Trend Flex-Loc Child Restraint Tests; Reports, Photos, Videos; Test Date: 5/25/07; Baby Trend Model 6532 Pre-Production Child Restraint Tests; Reports, Photos, Videos; Test Date: 4/12-13 & 5/02 & 11/07 (BT12756-13057)		H, A, FD, (ALL)			
1028		Baby Trend Documents (BT13058-13139)		H, A, FD, (ALL)			
1029		Intertek Reports (BT13279-13290)		H, A, FD, (ALL)			
1030		NHTSA Reports (BT13291-13378)		H, A, FD, (ALL)			
1031		BT EP Inspection Photos 4/6/16 (Ribeiro EP1-332)					
1032		BT EP Inspection Photos 1/18/17 (Ribeiro EP333-739)					
1033		BT Prange Inspection Photos 1/18/17 (Prange 1-39)					
1034		BT Wood Inspection Photos 1/18/17 (Wood 1-27)					
1035		MDC 2005 Changes (MDC 1-174)		H, A, FD, (ALL)			
1036		MDC Latch-Loc (MDC 175-1009)		H, A, FD, (ALL)			

1037		MDC OPP Base MDC 1010-1492)		H, A, FD, (ALL)			
1038		MDC OPP Base Foot (MDC1493-1499)		H, A, FD, (ALL)			
2039		MDC 213 Instructions; 213-2005; Development Schedule; ICS Contract Final; ICS Contract Final 2; ICS Contract Exhibit A; ICS Contract Signature Page; MDC Production; MDC's Paper File; OPP Infant Care Seat Final Contract; Patent Numbers; Recap of Dates Infant Car Seat Project (MDC 1500-1642)		H, A, FD, (ALL)			
1040		Lerado Initial Disclosures: Car Seat Production Agreement; Lerado Internal Invoices; Product Quality Specifications; Car Seat Photos; Emails re new buckles; Emails re crash testing bates, Invoices from Lerado to Baby Trend, Baby Trend Parts Agreement (Ler 110-136)		H, A, FD, (ALL)			
1041		Certificate of Compliance for Toys "R" Us (Ler 160-161)		H, A, FD, (ALL)			
1042		Management Systems Certificates (Ler 162-166)		H, A, FD, (ALL)			
1043		Photos of sample car seat (Ler 167-170)		FD			
1044		Calspan testing documents (Ler 171-217)		FD, H			
1045		Internal testing documents (Ler 218-263)		FD			
1046		Additional invoices to Baby Trend (Ler 264-268)					
1047		Repeat: Parts MOQ Agreement (Ler 269-272)					
1048		Injection Spreadsheet (Ler 273-278)					
1049		Bill of Materials (Ler 279-290)					
1050		Emails between Denny Tsai, Mark and others (Ler 291-302)		FD, H			
1051		FMVSS 209: Seat Belt Assemblies (Chinni 3898)					
1052		FMVSS 213: Child Restraint Systems (Chinni 3917)					

1053		ECE Regulation 44: Uniform Provisions Concerning the Approval of Restraining Devices for Child Occupants of Power Driven Vehicles (Chinni 3960)	FD, L			
1054		DOT HS 809 671, Misuse of Child Restraints, January 2004 (Chinni 4062)	H, A, FD, (ALL)			
1055		US Patent 4660889 Harness Web Adjuster with Child Restraint Seat, Filed 12/17/1985 (Chinni 3856)	FD, H			
1056		US Patent 4679852 Remote Harness Web Adjuster, Filed 6/30/1986 (Chinni 3868)	FD, H			
1057		Exemplar Baby Trend Flex-Loc CRS, Model Number CS31715, Mfg. 5/10/2013	H, A, FD, (ALL)			
1058		Exemplar F100152A A-Lok adjuster strap sample, manufactured Dec. 2013	H, A, FD, (ALL)			
1059		US Patent 5704684 Integrated Child Seat with Child Seat Belt Retractor, Filed 2/10/1995 (Chinni 3881)	H, A, FD, (ALL)			
1060		NHTSA Campaign 971001000, October 24, 1996 (Chinni 3782; 3828; 3830)	H, A, FD, (ALL)			
1061		NHTSA Campaign 98V185000, August 6, 1998 (Chinni)	H, A, FD, (ALL)			
1062		Figure 1 from 2/28/17 Expert Report of Jim Chinni: IMMI Fabrication Label, from 4/11/16 inspection				
1063		Figure 2 from 2/28/17 Expert Report of Jim Chinni: IMMI Drawing from Exhibit 51 of J. King Deposition (Chinni)				
1064		Figure 3 from 2/28/17 Expert Report of Jim Chinni: IMMI A-Lok Strap, from Exhibit 54 of J. King Deposition (Chinni)				
1065		Figure 4 from 2/28/17 Expert Report of Jim Chinni: Back Side of Seat, from Exhibit 11 of J. King Deposition (Chinni)				
1066		Figure 5 from 2/28/17 Expert Report of Jim Chinni: Visible Portion of Adjuster Strap, from Exhibit 11 (Chinni)				

	1067		Figure 6 from 2/28/17 Expert Report of Jim Chinni: Illustration of Supply Chain for Subject CRS		FD			
	1068		Car Seat Inspection Video 1/18/17 (BT VanArsdell)		H			
	1069		Engineering Principles CRS Photographs, taken 2/10/17		H, A, FD, (ALL)			
	1070		Statement of Deanna Ribeiro, taken 5/27/11		FD			
	1071		Statement of Francisco Ribeiro, taken 5/27/11		H, A, FD, (ALL)			
	1072		Statement of Karen Lewandowski, taken 5/27/11		H, A, FD, (ALL)			
	1073		Statement of Michael Lewandowski, taken 5/27/11		H, A, FD, (ALL)			
	1074		Image from page 11 of 2/28/17 Expert Report of Will Van Arsdell: Carrier and base models available in 2006		H, A, FD, (ALL)			
	1075		Image from page 18 of 2/28/17 Expert Report of Will Van Arsdell: Police photo 5/27/11					
	1076		Color photographs accompanying 2/28/17 Expert Report of Will Van Arsdell as Attachment 1: 22 images of various exemplar CRSs and chest clips		H, A, FD, (ALL)			
	1077		Exemplar CAMI dummy		U, ALL			
	1078		Photographs from Dr. Art Hoffmann's report					
	1079		US Patent: US 7040694 B2 (94)					
	1080		US Patent: US 7004541 B2 (5)					
	1081		US Patent: US 6979057 B2 (6)					
	1082		US Patent: US 6916066 B2 (7)					
	1083		US Patent: US 6913313 B2 (8)					
	1084		US Patent: US 6834915 B2 (9)					
	1085		US Patent: US 6811216 B2 (10)					
	1086		Car seat photos (11)					
	1087		Flex-Loc infant car seat owner's manual (12)					

	1088		Flex-Loc infant car seat owner's manual (13)		FD			
	1089		Flex-Loc infant car seat owner's manual (14)		FD			
	1090		Consultant Agreement May 2003 (15)					
	1091		Consultant Agreement March 2000 (16)					
	1092		MDC product development (17)					
	1093		Child restraint system test results Baby Trend (18)		H, A, FD, (ALL)			
	1094		2-piece snap together harness tie (20)					
	1095		"New" KH buckle email (21)		H			
	1096		Blow mold base email (22)		H			
	1097		HPP Latch-Loc samples (23)		H			
	1098		Revised buckle samples for crash-testing email (24)		H			
	1099		2004 car seat detail (27)		H			
	1100		Car seat diagrams (28)					
	1101		Buckle photos (29)					
	1102		06/07 catalog (30)					
	1103		Trendsport Traveler instruction manual (31)					
	1104		Travel system patent overview (32)					
	1105		Car seat features (33)					
	1106		Redesign of Latch-Loc and Flex-Loc infant seats to meet the requirements of FMVSS 213 which will become effective 8/01/05 (34)					
	1107		BT crash-test matrix for 4-12/13-07 MGA (35)		H, A, FD, (ALL)			
	1108		NHTSA final report 213-UST-06-48 (36)		H, A, FD, (ALL)			
	1109		NHTSA report no. 213-NAWC-06-002 (37)		H, A, FD, (ALL)			
	1110		Karen Triplett email (41)		H, A, FD, (ALL)			
	1111		OPP car seat production agreement (43)					

1112		Trendsport Traveler instruction manual (49)						
1113		IMMI document production (51)		H, A, FD, (ALL)				
1114		Strap photos (54)		H, A, FD, (ALL)				
1115		IMMI control of records (55)						
1116		Car seat photos (58)						
1117		Residence photos (59)						
1118		Baby Trend English owner's manual diagram (60A)		H, A, FD, (ALL)				
1119		Warranty (60)		H, A, FD, (ALL)				
1120		Safe Kids child passenger safety checklist (61)						
1121		Parcel information (63)		H, A, FD, (ALL)				
1122		Floor plan (64)						
1123		Google maps McDonald's (65)						
1124		KPD records (67)		H, A, FD, (ALL)				
1125		Records of Good Samaritan Hospital (68)						
1126		Lucas history/physical 5/27/11 GSH (73)						
1127		Lucas outpatient report 5/27/11 (74)						
1128		Lucas discharge summary (75)						
1129		Lucas physician's orders and progress notes 5/27/11 (76)						
1130		Safe Kids Platte Valley subpoena response (77)		H, A, FD, (ALL)				
1131		Child passenger safety checklist (78)		H, A, FD, (ALL)				
1132		Child passenger safety checklist (79)						
1133		Handwritten notes by Dowling showing chain of custody (80)						
1134		Photo of bates in exhibit 67 with Karen Lewandowski markings (81)						

1135		Medical records (83)		H, O- Coll. Source			
1136		Medical records (84)		H, O- Coll. Source			
1137		Medical records (85)		H, O- Coll. Source			
1138		Medical bills 86A disk of bills – retained by M. Coyle (86; 86A)		H, O- Coll. Source			
1139		CH & CSP 000001-011793 (88)		H, O- Coll. Source			
1140		Call log Baby Trend (90)		H, A, FD, (ALL)			
1141		Child restraint registration (91)					
1142		Car seat photos (96)					
1143		Product quality specification (98)					
1144		Lerado proforma invoice (99)					
1145		F007 OPP car seat issues and follow-up working sheet (100)					
1146		Certificate of compliance for Toys “R” Us Corporation – USA (101)		H, A, FD, (ALL)			
1147		Test standard report (102)					
1148		Car seat photos (103)					
1149		Parts IMOQ agreement (104)					
1150		Parts (105)					
1151		Parts (106)					
1152		Patent chart (107)					
1153		Test samples/photos/report (108)					
1154		Baby Trend purchase order (109)					
1155		Flex-Loc infant car seat owner's manual (114)					
1156		Baby Trend call logs starting in 2000 (116)		FD, H			
1157		Collection of emails sent or received by Tsai (117)		H			

1158		Plaintiffs' response to request for production of documents attached to deposition notice for Arthur Hoffmann, P.E. (120)	H, A, FD, (ALL)			
1159		CV Arthur Hoffmann (121)				
1160		Van Arsdell report, CV, testimony list and associated items (177)	H, A, FD, (ALL)			
1161		Van Arsdell file materials; Exponent Surrogate Photos taken 2/17/17 (178)	H, A, FD, (ALL)			
1162		Chinni document production (Chinni_0001 – Chinni_4231; 186)	H, A, FD, (ALL)			
1163		Car seat photos (Chinni_003851 – Chinni_3853; 188)	H, A, FD, (ALL)			
1164		Ribeiro inspection report (Chinni_03854 – Chinni_3855; 189)	H, A, FD, (ALL)			
1165		IMMI product description sheets A38042A, A38171A (Chinni_4228 – Chinni_4229; 190)	H, A, FD, (ALL)			
1166		IMMI product description sheets F14193, F100152A (Chinni_3756 – Chinni_3757; 191)	H, A, FD, (ALL)			
1167		Ribeiro exemplar photos (Prange3047-Prange3059; 193)	H, A, FD, (ALL)			
1168		Ribeiro surrogate photos (Prange3082-Prange3109; 194)	H, A, FD, (ALL)			
1169		Case Summary Michael T Prange, Ph.D., P.E. (Prange0041-Prange0082; 195))	H, A, FD, (ALL)			
1170		Humanetics CAMI 6 Month Old Dummy "Mark II" (Prange5079; 196)	H, A, FD, (ALL)			
1171		Ribeiro Exemplar III photos (Prange5152-Prange5153; 197)	H, A, FD, (ALL)			
1172		Ribeiro Exemplar II photos (Prange3060-Prange3081; 198)	H, A, FD, (ALL)			
1173		OPP car seat production agreement (5)				
1174		OPP car seat production agreement (1)				

	1175		Baby Trend OPP car seat mold test (3)		H, A, FD, (ALL)			
	1176		SGS invoice and test report (4)		H, A, FD, (ALL)			
	1177		Open issues on OPP car seat 4/26/04 (5)		FD, H			
	1178		Webbing latch adjuster bar stamping (6)		FD, H			
	1179		Email from Sedlack to Tsai re OPP 3D data 11/24/03 (7)		FD, H			
	1180		Email from Sedlack to Lerado re changes and corrections 8/02/05 (8)		FD, H			
	1181		Plaintiffs' Response to Request for Production: Children's Specialty Physicians, Children's Memorial Hospital, Rehab Specialists, American Medical Response, Great Plains Radiology, Total Respiratory Rehab, Family Physical Therapy, Baby Trend Manuals, Photos, Safe Kids, Good Samaritan Hospital, Children's Medical Hospital, Letter to Kearney Police Chief (Various by Provider)		H, A, FD, (ALL)			
	1182		Plaintiffs' Supplemental Response to Request for Production: NPPI, Hanger; Rehab Specialists, Childrens Hospital, Apria Healthcare, Kids on the Move, Family Physical Therapy, Kearney Clinic, Craig Home Care, Total Respiratory Rehab, ENT Specialists, Elkhorn Public Schools, Medical Bills, Kearney Public Schools, Millard Public Schools (Various by Provider)		H, A, FD, (ALL)			
	1183		Plaintiffs' 2 nd Supplemental Response to Request for Production: OrthoMedics, Walgreens, Rizal, Childrens Hospital (Various by Provider)		H, A, FD, (ALL)			

1184		Plaintiffs' 3 rd Supplemental Response to Request for Production: Medical Bills, OrthoMedics, Rizal, Craig HomeCare, Maxim Healthcare, Childrens Hospital, Total Respiratory and Rehab (Various by Provider)	H, A, FD, (ALL)			
1185		Plaintiffs' 4 th Supplemental Response to Request for Production: Elkhorn Public Schools (Elkhorn Public Schools 020-038)	H, A, FD, (ALL)			
1186		Plaintiffs' 4 th Supplemental Response to Request for Production dated 2/24/17: Munroe Meyer Institute (Munroe Meyer 001-1072)	H, A, FD, (ALL)			
1187		PL Kearney Clinic Medical Records (KC001-209)	H, A, FD, (ALL)			
1188		PL Total Respiratory and Rehab Bills (Bills 001-315)	H, A, FD, (ALL)			
1189		PL Madonna Rehabilitation Hospital (Madonna 0001-0061)	H, A, FD, (ALL)			
1190		PL 6 th Supplemental Response to Request for Production Children's Home Healthcare invoice 3-2017 (Children's Home Healthcare Bill for March 2017 001-002)	H, A, FD, (ALL)			
1191		Plaintiffs' 5 th Supplemental Response to Request for Production: Children's Home Healthcare, Childrens Specialty Physicians, Maxim Healthcare, Children's Hospital (Various by Provider)	H, A, FD, (ALL)			

1192		BT subpoenaed records: KPD videos, photos, 911 call, incident report, Ribeiro interview, evidence tracking, CAD call, audios, American Medical Response Patient Care, Children's Hospital Radiology, Children's Hospital, Children's Specialty Physicians, Family Physical Therapy, Good Samaritan Hospital, Great Plains Radiology, Kearney Clinic, Madonna Rehabilitation Hospital, Rehabilitation Specialists, Total Respiratory and Rehab (Various by Provider)	H, A, FD, (ALL)			
1193		BT Children's Home Healthcare (CHH 001-225)	H, A, FD, (ALL)			
1194		BT Children's Respite Care Center (CRCC 1-141)	H, A, FD, (ALL)			
1195		BT Craig Home Care (CHC001-205)	H, A, FD, (ALL)			
1196		BT Coram (Coram1-10)	H, A, FD, (ALL)			
1197		BT Coram Omaha (Coram Omaha 1-173)	H, A, FD, (ALL)			
1198		BT Hangar Orthotics (Hanger 001-031)	H, A, FD, (ALL)			
1199		Maxim Healthcare Services (MHC1-746)	H, A, FD, (ALL)			
1200		BT Omaha Public Schools (Omaha Public Schools1-351)	H, A, FD, (ALL)			
1201		Demonstrative exhibits as necessary	H, A, FD, (ALL)			
1202		Impeachment exhibits as necessary	H, A, FD, (ALL)			

OBJECTIONS

R: Relevancy

H: Hearsay

A: Authenticity

O: Other (specify)

FD: Foundation

U: Unavailable for inspection (all objections reserved)

ALL: All objections reserved

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEBRASKA**

FRANCO RIBEIRO and DEANNA)	CASE NO. 8:12CV204
RIBEIRO, as individuals and as next friends)	
and biological parents of LUCAS)	
RIBEIRO, an infant,)	
)	
Plaintiffs,)	
)	LERADO DEFENDANTS' SECOND
vs.)	AMENDED LIST OF EXHIBITS
)	
BABY TREND, INC., et al.,)	
)	
Defendants.)	

COME NOW, Lerado Defendants, by and through their counsel, and hereby submit the following second amended list of exhibits, subject to offer:

Trial Date(s): April 24, 2017

EXHIBIT NO.								
PLF	LER	IMMI	DESCRIPTION	OFF	OBJ	RCVD	NOT RCVD	DATE
	2001		Kearney Police Department Photographs from Incident 5 27 11 (KPD 0001-0263)					
	2002		Kearney Police Incident Report dated 5 27/11 (Julie King Depo. Ex. 51, pp. 1-23)		H. A. FD. ALL			
	2003		Deanna Ribeiro Transcribed Interview dated 5 27 11		H. A. FD. ALL			
	2004		(13) Car Seat Photographs Per April 6, 2016 Inspection (Deanna Ribeiro Depo. Ex. 58)					
	2005		(12) Photographs of Ribeiro Residence (Deanna Ribeiro Depo. Ex. 59)					
	2006		Baby Trend English Owner's Manual (Deanna Ribeiro Depo. Ex. 60A)		H. A. FD. ALL			
	2007		Baby Trend Warranty (Deanna Ribeiro Depo. Ex. 60B)		H. A. FD. ALL			
	2008		Good Samaritan Hospital Child Passenger Safety Checklist (Deanna Ribeiro Depo. Ex. 61)					
	2009		Diagram/Drawing of Ribeiro Home Layout (Deanna Ribeiro Depo. Exhibit 64)					
	2010		Webbing Latch Adjuster Bar Stamping Document (Brad Mattarocci Depo. Ex. 6)		FD, H			
	2011		OPP Car Seat Production Agreement – Fully Executed March 2004 (Brad Mattarocci Depo. Ex. 43)					
	2012		Design Documents, Diagrams, Photographs and Preliminary Bill of Materials (Roger Hsu Depo. Ex. 96)		H			
	2013		Proforma Invoice dated 6 5 07 for TrendSport Traveler (Roger Hsu Depo. Ex. 99)					
	2014		OPP Car Seat Issues and Follow-Up Working Sheet (BT Doc. Prod. 10376-10378) (Roger Hsu Depo. Ex. 100)					
	2015		Certificate of Compliance for Toys "R" Us Corporation – USA dated April 7, 2006 (Lerado		H. A. FD.			

		0160-0161) (Roger Hsu Depo. Ex. 101)		ALL			
2016		Test Standard Report (Lerado 0218-0243) (Roger Hsu Depo. Ex. 102)					
2017		Lerado Parts MOQ Agreement Between Baby Trend and Lerado dated March 22, 2007 (Lerado 0269-0272) (Roger Hsu Deposition Exhibit 104)					
2018		Bill of Materials (Lerado 0279-0290) (Roger Hsu Depo. Ex. 106)					
2019		Kendrion Control Instruction for Dual Tongue Infant Buckle dated 6/10/02 (Roger Hsu Depo. Ex. 108, pp. 10-13)					
2020		Baby Trend Purchase Order No. LD-632R2 dated 2/11/04 (Roger Hsu Depo. Ex. 109)					
2021		Mark Sedlack Email String with (3) photo attachments RE: Status of Changes and Corrections dated July/August 2005 (BT Doc Prod. 10114-10115; 10117)		A, FD, H			
2022		U.S. Patent 7,040,694 dated 5/9/06 (Mark Sedlack Depo. Ex. 4)		FD, H			
2023		U.S. Patent 7,004,541 dated 2/28/06 (Mark Sedlack Depo. Ex. 5)		FD, H			
2024		U.S. Patent 6,979,057 dated 12/27/05 (Mark Sedlack Depo. Ex. 6)		FD, H			
2025		U.S. Patent 6,916,066 dated 7/12/05 (Mark Sedlack Depo. Ex. 7)		FD, H			
2026		U.S. Patent 6,913,313 dated 7/5/05 (Mark Sedlack Depo. Ex. 8)		FD, H			
2027		Baby Trend Flex-Loc Infant Car Seat Owner's Manual (Mark Sedlack Depo. Exhibit 14)		FD			
2028		Consult Agreement Executed May 2003 Between Millenium Development Corp. (Mark Sedlack) and Baby Trend (Mark Sedlack Depo. Ex. 15)					
2029		Consult Agreement With Survival Provision Executed in 2000 Between Millenium Development Corp. (Mark Sedlack) and Baby Trend (Mark Sedlack Depo. Ex. 16)					
2030		Millenium Development Corporation's Infant Car Seat Estimated Schedule (Mark Sedlack Depo. Ex. 17)					
2031		Sedlack File Materials (MDC00741-00780) (Mark Sedlack Depo. Ex. 18)		H, A, FD, ALL			
2032		Email String RE: New KH Buckle between Mark Sedlack, George Lin, and Jason W. dated November 2005 (Mark Sedlack Depo. Ex. 21)		H, A, FD, ALL			
2033		Email String RE: Blow Mold Base between Mark Sedlack, Baby Trend and Lerado dated September 2005 (Mark Sedlack Depo. Ex. 22)		H, A, FD, ALL			
2034		Email String RE: HPP Latch - Loc Samples between Mark Sedlack, Baby Trend and Lerado dated October 2005 (Mark Sedlack Depo. Ex. 23)		H, A, FD, ALL			
2035		Email String RE: Revised Buckle Samples for Crash Testing between Mark Sedlack, Global Products, Baby Trend and Lerado dated September/October 2005 (Mark Sedlack Depo. Ex. 24)		H, A, FD, ALL			
2036		2004 Car Seat Detail (Mark Sedlack Depo. Ex. 27)		H			
2037		Baby Trend Trendsport Traveler Laurel Oak Instruction Manual (Mark Sedlack Depo. Ex. 31)		FD			
2038		Child Restraint System Component Tests Prepared for U.S. Department of Transportation - Final Report dated June 2, 2006 (Mark Sedlack Depo. Ex. 36)		H, A, FD, ALL			
2039		Child Restraint System Tests Prepared for U.S. Department of Transportation - Final Report dated July 24, 2006 (Mark Sedlack Depo. Ex. 37)		H, A, FD, ALL			

2040	ER Outpatient Discharge Summary Report for Lucas Ribeiro dated 5/27/11 (Katherine Keifer Depo. Ex. 75)	FD, H			
2041	Physician's Orders and Progress Notes from Good Samaritan Hospital dated 5/27/11 (Katherine Keifer Depo. Ex. 76)	FD, H			
2042	Responsive Documents from Safe Kids Per Subpoena (Safe Kids Sub. Resp. 1-58) (Jamie Cummings Depo. Ex. 77)	H, A, FD, ALL			
2043	Child Passenger Safety Checklist Form (Jamie Cummings Depo. Ex. 78)	H, A, FD, ALL			
2044	Child Passenger Safety Checklist (Executed) dated 9/18/10 (Karen Triplett Depo. Ex. 79)				
2045	Customer Call Log (Betty Tsai Depo. Ex. 90)	H			
2046	Child Restraint Registration Card (Betty Tsai Depo. Ex. 91)				
2047	Collection of Emails Sent and/or Received by Denny Tsai (Lerado 0061-0062; 0065-0070) (Denny Tsai Depo. Ex. 117 Excerpts)	FD, H			
2048	Standard Consumer Safety Specification for Hand-Held Infant Carriers – ASTM International F2050-03	FD, H			
2049	Rib Profile Diagrams (BT Doc. Prod. 10018-10019)	FD, H			
2050	Latch Strap Routing Diagrams (BT Doc. Prod. 10051 & 10056)	FD, H			
2051	Invoices for Buckles from Lerado Defendants' Initial Disclosures (Lerado 0003-0005)	H, A, FD, ALL			
2052	Preliminary Quotation For Buckle From Global Products, Inc. (MDC00765-00766) (Exhibit D to Lerado's Motion for Summary Judgment)	H			
2053	Lerado Defendants' Supplemental Responses to Plaintiffs' First Set of Requests for Production of Documents dated January 20, 2017 (Exhibit U to Lerado's Motion for Summary Judgment)	FD, H			
2054	(8) Photographs of Warning Labels (Exhibit W to Lerado's Motion for Summary Judgment)				
2055	Photograph of Car Seat From the Kearney Police Department File (KPD Sub Recs 70) (Exhibit Y to Lerado's Motion for Summary Judgment)				
2056	Mold Cavity Diagram (BT Doc. Prod. 10146)				
2057	Customer Statistic Information (Bo Isacson Depo. Ex. 3)	H, A, FD, ALL			
2058	Michael Prange's Final Expert Report dated 2/28/17 (Prange 0008-0040)	H, A, FD, ALL			
2059	Michael Prange's Supplemental Expert Report dated 3/30/17 (*Note: also marked as Ted Sokol Depo. Ex. 203)	H, A, FD, ALL			
2060	Michael Prange Depo. Exhibit 193 – (50) Car Seat Exemplar Photographs (Prange 3047-3059)	H, A, FD, ALL			
2061	Michael Prange Depo. Exhibit 196 – CAMI Dummy Specifications (Prange 5079)	H, A, FD, ALL			
2062	Michael Prange Depo. Ex. 197 – (7) Exemplar III Photographs of CAMI Dummy (Prange 5152-5153)	H, A, FD, ALL			
2063	Michael Prange Depo. Exhibit 198 – (87) Exemplar II Photographs of CAMI Dummy in Car Seat (Prange 3060-3081)	H, A, FD, ALL			
2064	Curriculum Vitae of Michael Prange	H			
2065	Video of April 6, 2016 Car Seat Inspection	FD, H			

2066		Video of January 18, 2017 Car Seat Inspection	FD, H			
2067		Curriculum Vitae of William Van Arsdell (Van Arsdell Depo. Ex. 177)	H			
2068		William Van Arsdell File Materials – including Surrogate Photos and Car Seat Exemplars - Baby Trend Flex-Loc 6311, Evenflo Cozy Carry 4771273P1, Evenflo Discovery 30211188, Peg Perego Auto Primo Viaggio 4040081, Britax Companion F91 2063, Graco Snuggly 7350DOH, and Safety 1 st Designer 22 DE2B001289 (Van Arsdell Depo. Ex. 178) (*Note: Surrogate photos also marked as Prange Depo. Ex. 194, Prange 3082-3109)	H, A, FD, ALL			
2069		William Van Arsdell's Supplemental Expert Report dated 3/30/17	H, A, FD, ALL			
2070		Christine Wood's (Exponent) Final Expert Report dated 2/28/17	H, A, FD, ALL			
2071		Curriculum Vitae of Christine Wood (Exponent)	H, A, FD, ALL			
2072		Christine Wood's Car Seat Inspection Photographs dated 1/18/17 (Wood Inspection 001-027)	H, A, FD, ALL			
2073		Richard Katz's Final Expert Report dated 2/27/17	H, A, FD, ALL			
2074		Curriculum Vitae of Richard Katz	H, A, FD, ALL			
2075		Depo. Transcript Video Matthew (Chip) Whalen	FD, H, ALL			
2076		Depo. Transcript Video Jamie Cummings	FD, H, ALL			
2077		Depo. Transcript Video Roger Hsu	FD, H, ALL			
2078		Depo. Transcript Video Mark Sedlack	FD, H, ALL			
2079		Depo. Transcript Video Jacqueline Liess	FD, H, ALL			
2080		Depo. Transcript Video Luke Cheng	FD, H, ALL			
2081		Depo. Transcript Video Denny Tsai	FD, H, ALL			
2082		Depo. Transcript Video Brad Mattarocci	FD, H, ALL			
2083		Depo. Transcript Video Bo Isacson	FD, H, ALL			
2084		Depo. Transcript Video Betty Tsai	FD, H, ALL			
2085		Depo. Transcript Video Dr. Katherine Keifer	FD, H, ALL			
2086		Depo. Transcript Video Michael Young	FD, H, ALL			
2087		Depo. Transcript Video Melody Gough	FD, H, ALL			
2088		Depo. Transcript Video Joshua Salter	FD, H, ALL			
2089		Depo. Transcript Video David Sesna	FD, H,			

				ALL			
			By identifying exhibits, Defendant does not stipulate to their admissibility, nor do we stipulate to authenticity of any exhibits we object to.				
			Many exhibits have been identified because of their possible relevance for impeachment and or rebuttal purposes and Defendant expressly reserves the right to withdraw exhibits depending on the Court's rulings on motions <i>in limine</i> and other pre-trial motions as well as Plaintiffs' actual proofs at trial and by identifying exhibits Defendant does not waive any of its arguments regarding any pending motions or evidentiary disputes.				
			All exhibits submitted with Pleadings, Motions and Memoranda in this case.	A, FD, H. U., ALL			
			Rebuttal and Impeachment exhibits.	A, FD, H. U., ALL			
			Any and all exhibits listed, used, or referred to by Plaintiffs or Co-Defendants at trial.				
			Defendant reserves the right to supplement their exhibit list with demonstrative exhibits, as necessary.				

			Defendant reserves the right to amend their exhibit list as necessary based on documents not yet received but produced in ongoing discovery or depositions or pursuant to subpoena.					
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OBJECTIONS

R: Relevancy

H: Hearsay

A: Authenticity

O: Other (specify)

FD: Foundation

U: Unavailable for inspection (all objections reserved)

All: All objections reserved

DATED this 17th day of April, 2017.

Respectfully submitted,

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 (ZHONG SHAN) INDUSTRIAL CO., LTD,
 LERADO CHINA LIMITED, LERADO H.K.
 LIMITED, MAXI MILIAAN B.V., and DOREL
 INDUSTRIES, INC.

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all counsel of record, via e-mail, on April 17, 2017.

/s/ Jeff W. Wright

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**Attorneys for Indiana Mills &
Manufacturing Inc.**

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA RIBEIRO,)
as individuals and as next friends and)
biological parents of LUCAS RIBEIRO, an)
infant,)

Plaintiffs,)

vs.)

BABY TREND, INC., et al.)

Defendants.)

Case No. 8:12-cv-00204

**PLAINTIFFS' AMENDED
WITNESS LIST**

COME NOW Plaintiffs, Franco Ribeiro and Deanna Ribeiro, by and through their counsel, and hereby submit the following amended witness list, subject to call:

<u>No.</u>	<u>Witness</u>	<u>Address/Phone</u>	<u>Status</u>
(1)	Abdallah, Elias	1202 Ave. K. Kearney, NE 68847	May Call (deposition)
(2)	Abdallah, Tara	1202 Ave. K. Kearney, NE 68847	Will Call
(3)	Allison, Kathie	6415 Washington Street Kansas City, MO 64113	Will Call
(4)	Anderson, Ofc. Joseph	Kearney Police Dept. 2025 A Avenue Kearney, NE 68847 (308) 237-2104	May Call
(5)	Beethe, Ryan	Maxim Healthcare Services 9239 West Center Rd Suite 100 Omaha, NE 68124 (402) 399-8888	May Call
(6)	Bell, Jill	Children's Hospital & Medical Center 8200 West Dodge St. Omaha, NE 68114 (308) 865-7100	Will Call
(7)	Blum, Heidi	Hillrise Elementary 20110 Hopper Street Elkhorn, NE 68022 (402) 289-2602	Will Call
(8)	Boswell, Patricia	Kearney, NE	May Call
(9)	Byrne, Ofc. Dennis G.	Kearney Police Dept. 2025 A Avenue Kearney, NE 68847 (308) 237-2104	May Call

(10)	Byum, Matt	Indiana Mills & Manufacturing, Inc. 18881 IMMI Way Westfield, IN 46074 (317) 896-9531	May Call
(11)	Castle, Megan	Craig Home Care 220 N. 89th Street, Suite 103 Omaha, NE 68114 (402) 502-5750	May Call
(12)	Caswell, Mary	Children's Hospital & Medical Center 8200 West Dodge St. Omaha, NE 68114 (308) 865-7100	May Call
(13)	Cheng, Kuang-Neng "Luke"	Lerado No. 202, Rd Caixing, Dongshen, Zhonshan city, Guangdong Province Zhongshan Guangdong 528414 China, 86-760-13416037746	Will Call (deposition)
(14)	Chinni, James	842 Dorchester Drive Noblesville, IN 46062	Will Call (deposition)
(15)	Cummings, Jamie	SafeKids Platte Valley Good Samaritan Health Services 1755 Prairie View Place Kearney NE 68845	Will Call (deposition)
(16)	Dowling, Ofc. Jeffrey	Kearney Police Dept. 2025 A Avenue Kearney, NE 68847 (308) 237-2104	May Call (deposition)
(17)	Gardner, Rob	2919 Canton Street Dallas, TX 75226 (214) 761-1809	May Call
(18)	Goebel, Debora, M.D.	ENT Specialists PC 720 North 129th Street Omaha, NE 68154	May Call
(19)	Gough, David	50 Plaza Blvd., Apt. 36 Kearney, NE 68845	May Call
(20)	Gough, Melody	50 Plaza Blvd., Apt. 36 Kearney, NE 68845	Will Call
(21)	Graf, Joseph	CHI Health Good Samaritan Hospital 10 E. 31st Street Kearney NE 68848 (308) 865-7100	May Call (deposition)
(22)	Haney, Suzanne, M.D.	Children's Hospital & Medical Center 8200 West Dodge St. Omaha, NE 68114 (308) 865-7100	Will Call
(23)	Hanks, Jacqueline	Children's Hospital & Medical Center 8200 West Dodge St. Omaha, NE 68114	May Call

		(308) 865-7100	
(24)	Hansen, Susan L.	Maxim Healthcare Services 9239 West Center Rd Suite 100 Omaha, NE 68124 (402) 399-8888	Will Call
(25)	Herstein, Kelli R., Ph.D.	11222 Jefferson Street Omaha, NE 68137	Will Call
(26)	Hill, Ofc. Dennis	Kearney Police Dept. 2025 A Avenue Kearney, NE 68847 (308) 237-2104	May Call (deposition)
(27)	Hoffmann, Arthur W., Ph.D.	887 Wind Drift Drive Traverse City, Michigan 49684	Will Call
(28)	Hsu, Roger	Lerado No. 202, Rd Caixing, Dongshen, Zhonshan city, Guangdong Province Zhongshan Guangdong 528414 China, 86-760-13416037746	Will Call (deposition)
(29)	Isacson, Bo	Gnotec/Holmbergs Stationsgatan 30, 302 45 Halmstad, Sweden	May Call (deposition)
(30)	Jarmin, Christopher	Buffalo County Sheriff's Office 2025 Avenue A Kearney, NE 68847 (308) 263-8555	May Call (deposition)
(31)	Jordan, Ashley	Baby Trend, Inc. 1607 S. Campus Ave. Ontario, CA 91761 909-773-0018	May Call
(32)	Joshi, Prashant, M.D.	Texas Tech University HSC 4800 Alberta Ave. El Paso, TX 79912	Will Call
(33)	Kafka, Adam, M.D.	Madonna Rehabilitation Hospital 5401 South St. Lincoln, NE 68506 (402) 413-3000	May Call
(34)	Kaler, Dave	Indiana Mills & Manufacturing, Inc. 18881 IMMI Way Westfield, IN 46074 (317) 896-9531	May Call
(35)	Keifer, Katherine, M.D.	Kearney Clinic, P.C. 211 W. 33rd Street Kearney, NE 68845 (308) 865-2141	Will Call (deposition)
(36)	King, Julia	Indiana Mills & Manufacturing, Inc. 18881 IMMI Way Westfield, IN 46074 (317) 896-9531	Will Call (deposition)
(37)	Kratochvil-Stava, Angela, M.D.	Kearney Clinic, P.C.	Will Call

		211 W. 33rd Street Kearney, NE 68845 (308) 865-2141	(deposition)
(38)	Krueger, Kurt, Ph.D.	John Ward Economics 8340 Mission Road, Ste. #235 Prairie Village, KS 66206	May Call
(39)	Larsson, Matz	Holmbergs Hong Kong Flat A2, Block A, 22/F Hong Nam Ind. Bldg. 603 Castle Peak Road Tsuenwan, N.T. Hong Kong CHINA	May Call
(40)	Lerner, Gary, M.D.	Children's Hospital & Medical Center Children's Developmental Clinic 8200 West Dodge St. Omaha, NE 68114 (308) 865-7100	Will Call
(41)	Lewandowski, Karen S.	411 E. 32nd Street Kearney, NE 68847	May Call (deposition)
(42)	Lewandowski, Michael	411 E. 32nd Street Kearney, NE 68847	May Call (deposition)
(43)	Lewis, Betty	Buffalo County Jail 1512 Central Ave. Kearney, NE 68847 (308) 233-5281	May Call (deposition)
(44)	Lewis, Ofc. Rob	Kearney Police Dept. 2025 A Avenue Kearney, NE 68847 (308) 237-2104	May Call
(45)	Liess, Jacqueline	SafeKids Platte Valley Good Samaritan Health Services 1755 Prairie View Place Kearney NE 68845	Will Call (deposition)
(46)	Mattarocci, Brad	Baby Trend, Inc. 1607 S. Campus Ave. Ontario, CA 91761 909-773-0018	Will Call
(47)	Maendele, Bill	CHI Health Good Samaritan Hospital 10 E. 31st Street Kearney NE 68848 (308) 865-7100	May Call (deposition)
(48)	Murray, Dawn, M.D.	Kearney Clinic, P.C. 211 W. 33rd Street Kearney, NE 68845 (308) 865-2141	Will Call (deposition)
(49)	Oliver, Young, M.D.	Children's Hospital & Medical Center 8200 West Dodge St. Omaha, NE 68114	May Call

		(308) 865-7100	
(50)	Pavkovic, Ivan, M.D.	Children's Hospital & Medical Center 8200 West Dodge St. Omaha, NE 68114 (308) 865-7100	May Call
(51)	Quinlan, Trent, M.D.	ENT Specialists PC 720 North 129th Street Omaha, NE 68154 (402) 397-0670	May Call
(52)	Ribeiro, Alex	3206 N. 202 nd Street Elkhorn, NE 68022	Will Call
(53)	Ribeiro, Deanna	3206 N. 202 nd Street Elkhorn, NE 68022	Will Call
(54)	Ribeiro, Fransisco	3206 N. 202 nd Street Elkhorn, NE 68022	Will Call
(55)	Ribeiro, Lucas	3206 N. 202 nd Street Elkhorn, NE 68022	Will Call
(56)	Rizal, Chandrika, M.D.	Children's Physicians Mission Village 16909 Q Street Omaha NE 68135 (402) 955-7575	Will Call
(57)	Roberts, Kimberly	Hillrise Elementary 20110 Hopper Street Elkhorn, NE 68022	May Call
(58)	Salter, Ofc. Joshua	Kearney Police Dept. 2025 A Avenue Kearney, NE 68847 (308) 237-2104	May Call (deposition)
(59)	Sedlack, Mark	5497 Grove Rd, Clinton, OH 44216	Will Call
(60)	Sesna, Ofc. David	Kearney Police Dept. 2025 A Avenue Kearney, NE 68847 (308) 237-2104	May Call (deposition)
(61)	Sokol, Ted, P.E.	11620 Arbor Street, Ste. #202 Omaha, NE 68144 (402) 572-9164	Will Call
(62)	Stentz, Terry L., Ph.D.	113 Nebraska Hall University of Nebraska - Lincoln Lincoln, NE 68588	Will Call
(63)	Thompson, Jerry	Indiana Mills & Manufacturing, Inc. 18881 IMMI Way Westfield, IN 46074 (317) 896-9531	May Call
(64)	Triplett, Karen	SafeKids Platte Valley Good Samaritan Health Services 1755 Prairie View Place Kearney NE 68845	Will Call (deposition)

(65)	Truemper, Edward, M.D.	Children's Hospital & Medical Center 8200 West Dodge St. Omaha, NE 68114 (308) 865-7100	May Call
(66)	Tsai, Betty	Baby Trend, Inc. 1607 S. Campus Ave. Ontario, CA 91761 909-773-0018	Will Call (deposition)
(67)	Tsai, Denny	Baby Trend, Inc. 1607 S. Campus Ave. Ontario, CA 91761 909-773-0018	Will Call (deposition)
(68)	Cheri Vampola	14030 Woolworth Circle Omaha, NE 68144	May Call
(69)	Ward, John O., Ph.D.	John Ward Economics 8340 Mission Road, Ste. #235 Prairie Village, KS 66206	Will Call
(70)	Whalen III, Matthew "Chip"	Baby Trend 1607 S. Campus Ave. Ontario, CA 91761 310-549-5400	Will Call (deposition)
(71)	Wilson, Mark, M.D.	Children's Specialty Physicians 111 N. 84th Street Omaha, NE 68114	May Call
(72)	Young, Sgt. Michael	Kearney Police Dept. 2025 A Avenue Kearney, NE 68847 (308) 237-2104	May Call (deposition)
(73)	Zapata, Fernando, M.D.	Children's Specialty Physicians 111 N. 84 th Street Omaha, NE 68114 (402) 955-5400	Will Call
(74)	Zhao-Ren, Chen	Lerado No. 202, Rd Caixing, Dongshen, Zhonshan city, Guangdong Province Zhongshan Guangdong 528414 China, 86-760-13416037746	May Call
(75)	Zheng-Long, Wu	Lerado No. 202, Rd Caixing, Dongshen, Zhonshan city, Guangdong Province Zhongshan Guangdong 528414 China, 86-760-13416037746	May Call

Plaintiffs reserve the right to select any witness identified on Defendants' witness lists to testify at trial.

Plaintiffs reserve the right to call witnesses at trial for impeachment purposes, if necessary.

Plaintiffs reserve the right to call witnesses at trial for purposes of establishing foundation to admit documents or respond to evidentiary objections, if necessary.

Plaintiffs reserve the right to amend or supplement this disclosure to add individuals identified through additional discovery and depositions in this matter, if necessary.

FRANCO RIBEIRO and DEANNA RIBEIRO,
as individuals and biological parents and next
friends of LUCAS RIBEIRO, an infant,
Plaintiffs,

By: /s/ Michael F. Coyle
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Jordan W. Adam, #23723
Emily J. Wischnowski, #25101
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Plaintiffs' Amended Witness List was served by electronic mail this 14th day of April, 2017, to:

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By: /s/ Michael F. Coyle, #18299

19197-51429/1649734

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**
Case No.: 8:12-cv-204

	A	B	C	F
	Witness	Address	Expect to Present at Trial	May Call at Trial if the Need Arises
1	Abdallah, Elias	1202 Avenue K Kearney, NE 68847 209-937-0207		x
2	Abdallah, Tara	1202 Avenue K Kearney, NE 68847 209-937-0207		x
3	American Medical Response, Inc.	9340 G. Ct. Omaha, NE 68127 402-331-2257		x
4	Apria Healthcare	3022 W. Potash Highway Grand Island, NE 68803 308-381-2416		x
5	Bell, Jill, APRN-NP	Children's Hospital & Medical Center 8200 W. Dodge St. Omaha, NE 68114 402-955-4177		x
6	Blum, Heidi	Hillrise Elementary 20110 Hopper St. Elkhorn, NE 68022 402-289-2602		x
7	Boswell, Patricia	Kearney Hub 4615 W. 2nd Ave. Kearney, NE 68847 Last known address		x
8	Byrne, Dennis	Kearney Police Department 2025 Avenue A Kearney, NE 68848 308-237-2104		x
9				

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**
Case No.: 8:12-cv-204

	A	B	C	F
1	Witness	Address	Expect to Present at Trial	May Call at Trial if the Need Arises
10	Care Centrix	P.O. Box 277947 Atlanta, GA 30384 800-808-1902		x
11	Children's Home Healthcare	4156 S. 52nd St. Omaha, NE 68117 402-955-7777		x
12	Children's Hospital & Medical Center	8200 W. Dodge St. Omaha, NE 68114 402-955-5400		x
13	Children's Physicians	16909 Q St. Omaha, NE 68135 402-955-7575		x
14	Children's Respite Care Center	5321 S. 138th St. Omaha, NE 68137 402-895-4000		x
15	Children's Specialty Physicians	111 N. 84th St. Omaha, NE 68114 402-955-5400		x
16	Chinni, James R.	Engineering Answers LLC 842 Dorchester Dr. Noblesville, IN 46062 317-877-7050	x	
17	Coram Omaha	11111 Mill Valley Rd. Omaha, NE 68154 402-330-5482		x
18	Craig Home Care	220 N. 89th St. Omaha, NE 68114 402-502-5750		x

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**
Case No.: 8:12-cv-204

	A	B	C	F
	Witness	Address	Expect to Present at Trial	May Call at Trial if the Need Arises
1				
19	Cummings, Jamie	Safe Kids Platte Valley 1755 Prairie View Place Kearney, NE 68845 308-865-2011	x	
20	Dowling, Jeff	Kearney Police Department 2025 Avenue A Kearney, NE 68848 308-237-2104	x	
21	ENT Specialists, P.C.	720 N. 129th St. Omaha, NE 68145 402-397-0670		x
22	Family Physical Therapy & Sports Center, P.C.	211 W. 33rd, Suite A Kearney, NE 68845 308-236-5884		x
23	Goebel, Debora	ENT Specialist, P.C. 720 N. 129th St. Omaha, NE 68145 402-955-6370		x
24	Good Samaritan Hospital	10 E. 31st St. Kearney, NE 68847 308-865-7100		x
25	Gough, Melody	50 Plaza Blvd., Apt. 36 Kearney, NE 68845 308-216-0242	x	
26	Graf, Joe	CHI Health Good Samaritan Hospital 10 E. 31st St. Kearney, NE 68847 308-865-7100	x	

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**
Case No.: 8:12-cv-204

	A	B	C	F
1	Witness	Address	Expect to Present at Trial	May Call at Trial if the Need Arises
27	Great Plains Radiology & Nuclear	10 E. 31st St. Kearney, NE 68847 308-234-5531		x
28	Haney, Suzanne B.	Children's Hospital & Medical Center 8200 W. Dodge St. Omaha, NE 68114 402-955-6250		x
29	Hanger Orthotics	8111 Dodge St., Suite 330 Omaha, NE 68114 402-384-8272		x
30	Hansen, Susan L.	Maxim Healthcare Services 9239 W. Center Rd., Suite 100 Omaha, NE 68124 402-399-8888		x
31	Hill, Dennis	Kearney Police Department 2025 Avenue A Kearney, NE 68848 308-237-2104		x
32	Hoover, Ryan	18881 IMMI Way Westfield, IN 46074 317-867-8196		x
33	Hsu, Roger	Lerado Group Co., LTD No 202, Rd. Caixing Dongshen, Zhoushan City, Guangdong Province Zhoushan Guangdong 528414 China 86-760-13416037746	x	

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**
Case No.: 8:12-cv-204

	A	B	C	F
1	Witness	Address	Expect to Present at Trial	May Call at Trial if the Need Arises
34	Hurlbutt, Cassidy S.	1315 E. 33rd Dr. Kearney, NE 68847 308-237-4827		x
35	Jarmin, Chris	Buffalo County Sheriff's Office 2025 Avenue A Kearney, NE 68847 308-236-8555	x	
36	Jordan, Ashley	1607 S. Campus Ave. Ontario, CA 91761 909-773-0018 Last known address		x
37	Kafka, Adam T.	Madonna Rehabilitation Hospital 5401 South St. Lincoln, NE 68506 402-489-7102		x
38	Kearney Clinic	Kearney Clinic, P.C. 211 W. 33rd St. Kearney, NE 68845 308-865-2141		x
39	Keifer, Katherine	Kearney Clinic, P.C. 211 W. 33rd St. Kearney, NE 68845 308-237-2141		x
40	Kids on the Move Physical & Occupational Therapy	3226 S. 112th St. Omaha, NE 68144 402-672-6794		x
41	King, Julia	18881 IMMI Way Westfield, IN 46074 317-867-8196	x	

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**
Case No.: 8:12-cv-204

	A	B	C	F
1	Witness	Address	Expect to Present at Trial	May Call at Trial if the Need Arises
42	Kratochvil-Stave, Angela	Kearney Clinic, P.C. 211 W. 33rd St. Kearney, NE 68845 308-865-2141		x
43	Kuang-Neng (Luke) Cheng Tsai, James Liu, Nancy	Lerado Group Co., LTD No 202, Rd. Caixing Dongshen, Zhoushan City, Guangdong Province Zhoushan Guangdong 528414 China 86-760-13416037746		x
44	Learner, Gary S.	Children's Hospital & Medical Center 8200 W. Dodge St. Omaha, NE 68114 402-955-5400		x
45	Lewandowski, Karen	411 E. 32nd St. Kearney, NE 308-234-5870		x
46	Lewandowski, Michael	411 E. 32nd St. Kearney, NE 208-234-5870		x
47	Lewis, Betty	Buffalo County Sheriff's Office 2025 Avenue A Kearney, NE 68847 308-236-8555		x
48	Liess, Jacqueline	Safe Kids Platte Valley 1755 Prairie View Place Kearney, NE 68845 308-865-2011	x	

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**
Case No.: 8:12-cv-204

	A	B	C	F
1	Witness	Address	Expect to Present at Trial	May Call at Trial if the Need Arises
49	Madonna Rehabilitation Hospital	5401 South St. Lincoln, NE 68506 402-413-3000		x
50	Maendele, Bill	CHI Health Good Samaritan Hospital 10 E. 31st St. Kearney, NE 68847 308-865-7100		x
51	Mattarocci, Brad	1607 S. Campus Ave. Ontario, CA 91761 909-773-0018	x	
52	Maxim Healthcare Services	9239 W. Center Rd., Suite 100 Omaha, NE 68124 402-399-8888		x
53	Murray, Dawn M.	Kearney Clinic, P.C. 211 W. 33rd St. Kearney, NE 68845 308-865-2141		x
54	NPPI - Anesthesiology	P.O. Box 30265 Omaha, NE 68103 800-411-7538		x
55	Omaha Public Schools	3215 Cuming St Omaha, NE 68131 531-299-0237		x
56	OrthoMedics	13217 F St. Omaha, NE 68137 402-614-7321		x

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**
Case No.: 8:12-cv-204

	A	B	C	F
1	Witness	Address	Expect to Present at Trial	May Call at Trial if the Need Arises
57	Pakvovic, Ivan	Children's Hospital & Medical Center 8200 W. Dodge St. Omaha, NE 68114 402-955-5372		x
58	Rehabilitation Specialists	P.O. Box 67129 Lincoln, NE 68506 402-489-7102		x
59	Ribeiro, Deanna	3206 N. 202nd St. Elkhorn, NE 68022 308-440-8556	x	
60	Ribeiro, Franco	3206 N. 202nd St. Elkhorn, NE 68022 308-440-8556	x	
61	Rizal, Chandrika	Children's Physicians, Mission Valley 16909 Q St. Omaha, NE 68135 402-955-7575		x
62	Roberts, Kimberly	Hillrise Elementary 20110 Hopper St. Elkhorn, NE 68022 402-289-2602		x
63	Salter, Josh	Kearney Police Department 2025 Avenue A Kearney, NE 68848 308-237-2104	x	
64	Sedlack, Mark	5497 Grove Rd. Clinton, OH 44216 330-882-5950	x	

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**
Case No.: 8:12-cv-204

	A	B	C	F
1	Witness	Address	Expect to Present at Trial	May Call at Trial if the Need Arises
65	Sesna, David	Kearney Police Department 2025 Avenue A Kearney, NE 68848 308-237-2104	x	
66	Total Respiratory & Rehab	4600 W. St., Suite A Lincoln, NE 68503 402-466-8384		x
67	Triplett, Karen	1010 F Ave. Kearney, NE 68847 308-338-3497		x
68	Tsai, Betty	1607 S. Campus Ave. Ontario, CA 91761 909-773-0018		x
69	Tsai, Denny	1607 S. Campus Ave. Ontario, CA 91761 909-773-0018		x
70	UNMC Physicians	988095 Nebraska Medical Center Omaha, NE 68198 402-559-9800		x
71	Walgreen's	1901 E. Voorhees St. Danville, IL 61834 217-554-8900		x
72	Whalen, Matthew Joseph "Chip" III	4001 Via Oro Ave. Long Beach, CA 90807 310-549-5400	x	
73	Wilson, Mark C.	Children's Specialty Physicians 111 N. 84th St. Omaha, NE 68114		x

Franco Ribeiro, et al. v. Baby Trend, Inc., et al. **Schedule A - IMMI's amended witness list**
Case No.: 8:12-cv-204

	A	B	C	F
1	Witness	Address	Expect to Present at Trial	May Call at Trial if the Need Arises
74	Young, Michael	Kearney Police Department 2025 Avenue A Kearney, NE 68848 308-237-2104	x	
75	Young, Oliver	Children's Hospital & Medical Center 8200 W. Dodge St. Omaha, NE 68114 402-955-5400		x
76	Zapata, Fernando	Children's Specialty Physicians 111 N. 84th St. Omaha, NE 68114 402-955-5400		x
77				
78	EXPERTS:			
79	James R. Chinni, P.E.	Engineering Answers LLC 842 Dorchester Dr. Noblesville, IN 46062 317-877-7050	x	
80	William W. Van Arsdell, Ph.D., P.E.	Engineering Principles, LLC 20 Main St., Suite 206 Natick, MA 01760 508-315-3900	x	

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEBRASKA**

FRANCO RIBEIRO and DEANNA)	CASE NO. 8:12CV204
RIBEIRO, as individuals and as next friends)	
and biological parents of LUCAS)	
RIBEIRO, an infant,)	
)	
Plaintiffs,)	
)	
vs.)	
BABY TREND, INC.; MARK SEDLACK;)	
MILLENIUM DEVELOPMENT CORP.;)	
INDIANA MILLS & MANUFACTURING)	
INC.; LERADO GROUP CO., LTD.;)	
LERADO GROUP (HOLDING) COMPANY)	
LTD.; LERADO (ZHONG SHAN))	
INDUSTRIAL CO., LTD.; LERADO CHINA)	LERADO DEFENDANTS'
LIMITED; LERADO H.K. LIMITED;)	AMENDED WITNESS LIST
HOLMBERGS SAFETY)	
SYSTEM HOLDING AB f/k/a)	
HOLMBERGS CHILDSAFETY HOLDING)	
AB a/k/a HOLMBERGS; CHILDSAFETY)	
AB d/b/a HOLMBERGS; HOLMBERGS)	
CHILDSAFETY AB f/k/a KENDRION)	
HOLMBERGS AB a/k/a HOLMBERGS)	
SAFETY SYSTEM HOLDING AB d/b/a)	
HOLMBERGS; GNOSJOGRUPPEN AB)	
f/k/a KENDRION AUTOMOTIVE METALS)	
AB d/b/a HOLMBERGS, HOLMBERGS)	
SAFETY SYSTEM HOLDING AB,)	
GNOTEC REFTELE AB, MAXI MILIAAN)	
B.V. and DOREL INDUSTRIES, INC.)	
)	
)	
Defendants.)	

COME NOW, the Lerado Defendants, and submit the following list of witnesses they may call and the witnesses' anticipated availability or lack of availability:

WITNESS LIST

No.	Witness	City/State	Availability
1.	Deanna Ribeiro	Elkhorn, Nebraska	Available
2.	Francisco Ribeiro	Elkhorn, Nebraska	Available
3.	Mark Sedlack	Clinton, Ohio	Available
4.	Jamie Cummings	Kearney, Nebraska	Deposition
5.	Jacquiline Liess	Kearney, Nebraska	Deposition
6.	Brad Mattarocci	Ontario, California	Deposition
7.	Matthew “Chip” Whalen	Long Beach, California	Deposition
8.	Dennis Tsai	Ontario, California	Deposition
9.	Roger Hsu	Chiayi, Taiwan	Deposition
10.	James Tsai	Taiwan	Deposition
11.	Michael Young	Kearney, Nebraska	Deposition
12.	David Sesna	Kearney, Nebraska	Deposition
13.	Joseph Graf	Kearney, Nebraska	Deposition
14.	William Van Arsdell	Natick, Massachusetts	Available
15.	Michael Prange	Philadelphia, Pennsylvania	Available
16.	Christine Wood	Menlo Park, California	Available
17.	Bo Isacson	Halmstad, Sweden	Deposition

17. Any and all other witnesses identified by the other parties in this matter.

DATED this 14th day of April, 2017.

Respectfully submitted,

HEIDMAN LAW FIRM, L.L.P.

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(ZHONG SHAN) INDUSTRIAL CO., LTD,
LERADO CHINA LIMITED, LERADO H.K.
LIMITED, MAXI MILIAAN B.V., and DOREL
INDUSTRIES, INC.

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause by depositing the same in the U.S. Mail, postage prepaid, to their respective mailing addresses disclosed on the pleadings or, in the event the party is represented by counsel, to their counsel; or notice of the filing of this instrument was sent by e-mail, via CM/ECF, to all parties on the service list who have registered to receive service by e-mail over CM/ECF, on April 14, 2017.

/s/ Jeff W. Wright

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**Attorneys for Indiana Mills &
Manufacturing Inc.**